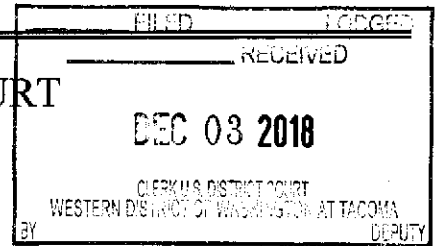


## UNITED STATES DISTRICT COURT

for the  
Western District of Washington

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)

The locations and vehicles more particularly described in  
Attachments A, and A1 through A84

Case No. MJ18-5277

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachments A, and A1 through A84,

located in the Western District of Washington, there is now concealed (identify the person or describe the property to be seized):

See Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☒ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
21 USC 841(a)(1), 843(b), 846, and 18 USC 924(c), 1956, and 1957	Drug trafficking conspiracy and related offenses, money laundering and related offenses.

The application is based on these facts:

See Attached Affidavit of DEA Special Agent Jeremy Tan.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Jeremy Tan  
(applicant's signature)

Jeremy Tan, DEA Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 12/03/2018

Theresa L. Fricke  
(Judge's signature)

City and state: Tacoma, Washington

Theresa L. Fricke, United States Magistrate Judge

Printed name and title



## II. PURPOSE OF AFFIDAVIT

4. This Affidavit is submitted in support of an application to search the following 48 locations and 35 vehicles, as further described in Attachments A, and A1 to A84<sup>1</sup> for evidence, fruits and instrumentalities of drug trafficking and money laundering crimes committed by the drug trafficking organization (DTO) referred to herein as the CASTRO DTO, in violation of Title 21, United States Code, Sections 841(a)(1), 843(b), 846, and 952, and Title 18, United States Code, Sections 924(c), 1956, and 1957, as further described in Attachment B. The locations and vehicles that I am requesting authorization to search are identified in bold font throughout this Affidavit, and each specific location and vehicle is described more particularly in Attachments A1 through A84. With respect to the 35 vehicles, although my application to search each of the 48 locations includes a request to search vehicles found on the curtilage of the respective location, I am specifically requesting authorization to search the 35 vehicles listed herein in the event they are not physically present or otherwise within the curtilage of the particular location being searched.

### LOCATIONS TO BE SEARCHED

- 1) Suspected drug and money stash location and prior residence of Carlos Eduardo LOPEZ Hernandez: **22025 100th Ave. SE, Kent, Washington;**
- 2) Residence of Carlos Eduardo LOPEZ Hernandez: **Pasa Fino II Apartments 12212 SE 310th St., Apt AA303, Auburn, Washington;**
- 3) Business location of Cindy SOLTERO Jimenez: **Soltero's Market Mexican Store, 24202 104th Ave. SE, Unit 104, Kent, Washington;**
- 4) Residence of Cindy SOLTERO Jimenez: **31600 126th Ave. SE, Space 106, Auburn, Washington 98092;**
- 5) Residence of Jesus Rene SARMIENTO Valenzuela: **10545 SE 238th St., Unit 8, Kent, Washington;**

---

<sup>1</sup> Due to a last-minute change to this document, there is no Attachment A49 included with this Affidavit.

- 1 6) Residence of Jaime HEREDIA Castro and Jose Luis SIERRA Barrientos: **350 S**  
2 **Burlington Blvd., Burlington, Washington;**
- 3 7) Residence of Juan AVILES Berrelleza: **11247 SE 258th Pl., Apartment D306,**  
4 **Kent, Washington;**
- 5 8) Residence of Hector Manuel URIAS Moreno: **428 105th St. SW, Everett,**  
6 **Washington;**
- 7 9) Stash location for Hector Manuel URIAS Moreno: **8503 8th Ave. W, Everett**  
8 **Washington;**
- 9 10) Residence of Jorge VALENZUELA Armenta: **4416 S 137th St., Tukwila,**  
10 **Washington;**
- 11 11) Residence of Michael John and Esther La Rena SCOTT: **8024 150th St. SE,**  
12 **Snohomish, Washington;**
- 13 12) Business location of Michael John and Esther La Rena SCOTT: **Wired in**  
14 **Networks, 18421 Highway 99, Suite B, Lynnwood, Washington;**
- 15 13) Residence of Gerald Keith RIGGINS: **5824 152nd St. E, Puyallup, Washington;**
- 16 14) Residence of Julian Gauge ORDONEZ: **34402 28th Pl. SW, Federal Way,**  
17 **Washington;**
- 18 15) Residence of Julian Gauge ORDONEZ: **34235 18th Pl. S, Federal Way,**  
19 **Washington;**
- 20 16) Residence of Monique GREEN: **1020 SW 305th St., Federal Way, Washington;**
- 21 17) Residence of Rolando ESPINDOLA Hernandez and Jessica JOHNSON: **314 N**  
22 **133rd St., Seattle, Washington;**
- 23 18) Stash location for Carlos Alejandro CASTRO Perez and Nicolas CISNEROS:  
24 **952 SW Campus Dr., Apt 26E-1, Federal Way, Washington;**
- 25 19) Residence of Carlos Alejandro CASTRO Perez: **Fox Run Apartments, 34726**  
26 **2nd Lane S, Unit C40, Federal Way, Washington;**
- 27 20) Residence of Emmanuel REYES Perez: **2136 S 260th St., Apartment CC-201,**  
28 **Des Moines, Washington;**



- 1 21) Residence of Karen SURYAN: 210 NW 107th St., Seattle, Washington;
- 2 22) Residence of Michael SURYAN: 16809 8th Ave. SW, Normandy Park,
- 3 Washington;
- 4 23) Residence of Orlando BARAJAS: 310 N Anacortes St., Burlington,
- 5 Washington;
- 6 24) Business location of Orlando BARAJAS: Taco El Antojito, 628 E Fairhaven
- 7 Ave., Burlington, Washington;
- 8 25) Residence of Jose VELASCO: 506 Tiger Lane, Burlington, Washington;
- 9 26) Residence of Brian LIVELY: 8123 71st Pl. SE, Snohomish, Washington;
- 10 27) Residence of Uriel ZELAYA: 28527 37th Pl. S, Auburn, Washington;
- 11 28) Residence of Omar VALTIERRA: 16508 SE 147th St., Renton, Washington;
- 12 29) Residence of Jerry Austin RODRIGUEZ Jaime: 859 116th St., Tacoma,
- 13 Washington;
- 14 30) Residence of Jake WILSON: 7111 193rd St. E, Spanaway, Washington;
- 15 31) Residence of Joshua MENDIOLA: a 5th wheel trailer parked at 21515 111th
- 16 Ave. Court E, Graham, Washington;
- 17 32) Residence of Alex and David HUBLY: 713 S Yakima Ave., Apartment 9,
- 18 Tacoma, Washington;
- 19 33) Residence of Charles JOSLYN: 8422 214th Ave. E, Bonney Lake, Washington;
- 20 34) Residence of Tim CRAWFORD: 3435 Auburn Way S, Apartment 38, Auburn,
- 21 Washington;
- 22 35) Residence of Kurtis and Lindsay NEMEYER: 9119 114th St. E, Puyallup,
- 23 Washington;
- 24 36) Residence of Natasha DJORDJEVIC: 1001 E 63rd St., Tacoma, Washington;
- 25 37) Residence of Corey RILEY: 9121 Washington Hwy 162, Puyallup,
- 26 Washington;
- 27 38) Residence of Julia CAMMEL: 7002 224th St. E, Graham, Washington;
- 28 39) Residence of Blake HYNEK: 1908 92nd Ave. E, Edgewood, Washington;

- 1 40) Residence of Larry SWEITZER: **75 Brookdale Lane, Apartment E102,**  
2 **Bremerton, Washington;**
- 3 41) Storage unit of Gregory WERBER: **Unit 248B at 1st Avenue Self Storage, 2400**  
4 **1st Ave. South, Seattle, Washington;**
- 5 42) Residence of Frances and Agustin JUAREZ Castillo: **20707 106th Pl. SE, Kent,**  
6 **Washington;**
- 7 43) Residence of Carlos HERNANDEZ: **521 S Henderson St., Seattle, Washington;**
- 8 44) Residence of Edgar CABRERA: **900 NE 65th St., Apartment 609, Seattle,**  
9 **Washington;**
- 10 45) Residence of Constantino MARES Garcia: **1312 80th Ave. SE, Lake Stevens,**  
11 **Washington;**
- 12 46) Residence of Oscar Humberto CARRILLO Salcedo: **Airmark Apartments, 229**  
13 **Andover Park East, Apartment 409, Tukwila, Washington;**
- 14 47) Residence of Martin Dean GREGORY: **204 18th St. SE, Puyallup, Washington;**  
15 **and**
- 16 48) Residence of Jose RANGEL Ortega: **11007 Paine Field Way, Everett,**  
17 **Washington.**

18 **VEHICLES TO BE SEARCHED**

- 19 1) Vehicle driven by Carlos Eduardo LOPEZ Hernandez: **a red 2006 Ford Ranger**  
20 **bearing Washington license C04697M (also referred to as Target Vehicle 4, or**  
21 **TV4);**
- 22 2) Vehicle driven by Jesus Rene SARMIENTO Valenzuela: **a white 2008 Honda**  
23 **Accord bearing Washington license BJN4395 (also referred to as Target**  
24 **Vehicle 3 or TV3);**
- 25 3) Vehicle driven by Jaime HEREDIA Castro: **a red 2002 Honda Civic bearing**  
26 **Washington license BKS2788;**  
27  
28

- 1 4) Vehicle driven by Juan AVILES Berrelleza: **a beige 2001 Jeep Grand Cherokee**  
2 **bearing Washington license BKG1931** (also referred to as **Target Vehicle 8 or**  
3 **TV8**);
- 4 5) Vehicle driven by Cindy SOLTERO Jimenez: **a 2016 Nissan Frontier bearing**  
5 **Washington license C30123H**;
- 6 6) Vehicle driven by Hector Manuel URIAS Moreno: **a black 2007 Kia Rondo**  
7 **bearing Washington license BLE9305** (also referred to as **Target Vehicle 7 or**  
8 **TV7**);
- 9 7) Vehicle driven by Carlos Alejandro CASTRO Perez: **a green 2005 BMW X5**  
10 **bearing Washington license BJM0956** (also referred to as **Target Vehicle 9 or**  
11 **TV9**);
- 12 8) Vehicle driven by Michael John SCOTT: **a 2008 black Honda Civic bearing**  
13 **Washington License BFZ2558**;
- 14 9) Vehicle driven by Julian Gauge ORDONEZ: **a 2000 tan Chevy Silverado**  
15 **bearing Washington license C67402H**;
- 16 10) Vehicle driven by Esther La Rena SCOTT: **a silver 2013 Toyota Highlander**  
17 **bearing Washington license AQB8456**;
- 18 11) Vehicle driven by Edgar CABRERA: **a grey 2009 Toyota Camry bearing**  
19 **Washington license BKD8497** (also referred to as **Target Vehicle 14 or TV14**);
- 20 12) Vehicle driven by Rolando ESPINDOLA: **a red 1995 Mitsubishi Eclipse**  
21 **bearing Washington license AEV9270**;
- 22 13) Vehicle driven by Gerald Keith RIGGINS: **a 2010 Harley Davidson motorcycle**  
23 **bearing Washington License 3E8988**;
- 24 14) Vehicle driven by Michael SURYAN: **a silver 2000 Toyota Camry bearing**  
25 **Washington license BKU5269**;
- 26 15) Vehicle driven by Jose RANGEL Ortega: **a grey 2007 Toyota Scion bearing**  
27 **Washington license BGH6676** (also referred to as **Target Vehicle 13 or TV13**);  
28

- 1 16) Vehicle driven by Constantino MARES Garcia: **a white 1998 Honda Accord**  
2 **bearing Washington license BKC6466;**
- 3 17) Vehicle driven by Constantino MARES Garcia: **a blue 2016 Toyota Tacoma**  
4 **bearing Washington license C08613M;**
- 5 18) Vehicle driven by Orlando BARAJAS: **a red 2018 Chevrolet Silverado bearing**  
6 **Washington license C66267L;**
- 7 19) Vehicle driven by Martin Dean GREGORY: **a spray-painted red 2001 Lexus IS**  
8 **bearing Washington license 419ZVA;**
- 9 20) Vehicle driven by Omar VALTIERRA: **a white 2012 Dodge Ram 1500 truck**  
10 **bearing Washington license C50312M;**
- 11 21) Vehicle driven by Omar VALTIERRA: **a 2013 black Chrysler 300 sedan**  
12 **bearing Washington license AKG4277;**
- 13 22) Vehicle driven by Jorge VALENZUELA Armenta: **a 2005 grey Volkswagen**  
14 **Jetta bearing Oregon license 902KTS;**
- 15 23) Vehicle driven by Jose VELASCO: **a 2001 white Nissan Altima bearing**  
16 **Washington license AVW7517;**
- 17 24) Vehicle driven by Andrew Cain KRISTOVICH: **a 2000 black Mercedes 5004D**  
18 **bearing Washington license BLY6302 (also referred to as Target Vehicle 11 or**  
19 **TV11);**
- 20 25) Vehicle driven by Andrew Cain KRISTOVICH: **a 2002 silver Mercedes 3204D**  
21 **bearing Washington license AYT2335 (also referred to as Target Vehicle 12 or**  
22 **TV12);**
- 23 26) Vehicle driven by Carlos Alejandro CASTRO Perez: **a 2012 white Hyundai**  
24 **Accent bearing California license 7CQD771 (also referred to as Target Vehicle**  
25 **10 or TV10);**
- 26 27) Vehicle driven by Carlos HERNANDEZ: **a grey 2004 Hummer H2 bearing**  
27 **Washington license ADH9133;**
- 28

- 1 28) Vehicle driven by Uriel ZELAYA: **a black 1999 Toyota Corolla bearing**
- 2 **Washington license AXZ8671;**
- 3 29) Vehicle driven by Ramon PUENTES: **a 2010 red tractor trailer truck bearing**
- 4 **California license XP09765;**
- 5 30) Vehicle driven by Jerry Austin RODRIGUEZ Jaime: **a blue 2004 Volvo S80**
- 6 **bearing Washington license plate BHK8013;**
- 7 31) Vehicle driven by Brian LIVELY: **a silver 2006 BMW bearing Washington**
- 8 **license AYY7257;**
- 9 32) Vehicle driven by Brian LIVELY: **a black Chevrolet Silverado bearing**
- 10 **Washington license C21970N;**
- 11 33) Vehicle driven by Larry SWEITZER: **a blue Ford focus bearing Washington**
- 12 **License BER8834;**
- 13 34) Vehicle driven by Joshua MENDIOLA: **a 1996 white Nissan Maxima bearing**
- 14 **Washington license BGR7720; and**
- 15 35) Vehicle driven by Oscar Humberto CARRILLO Salcedo: **a grey 2016 Honda**
- 16 **Accord bearing Arizona license CJN8101 and Oregon license CA99207.**

### 17 III. INVESTIGATION OVERVIEW

18 5. Agents are investigating a drug trafficking organization (DTO) in Western  
 19 Washington they believe Juan and Florencio Castro Valenzuela and their associates,  
 20 including Jesus Rene SARMIENTO Valenzuela, Jorge VALENZUELA Armenta, Arturo  
 21 FRIAS Ceballos, Carlos Eduardo LOPEZ Hernandez, Juan Jose HIGUERA Gonzalez,  
 22 Jaime HEREDIA Castro, Daniel Osvaldo ROCHA Lopez, Juan AVILES Berrelleza,  
 23 Manuel LOYA Soto (aka Jesus Loya Soto), Leonel Sillas Berrelleza, Oscar Humberto  
 24 CARRILLO Salcedo, Gregory WERBER, Hector Manuel URIAS Moreno, Jose  
 25 RANGEL Ortega, Cesar LOYA, Carlos Alejandro CASTRO Perez, Cindy SOLTERO  
 26 Jimenez, Michael John SCOTT, Esther La Rena SCOTT, Gerald Keith RIGGINS, Julian  
 27 Gauge ORDONEZ, Monique GREEN, Rolando ESPINDOLA, Jessica JOHNSON,  
 28 Emmanuel REYES Perez, Michael SURYAN, Karen SURYAN, Orlando BARAJAS,

1 Jose VELASCO, Brian LIVELY, Alek James BAUMGARTNER, Andrew Cain  
2 KRISTOVICH, Brittany Renae KRISTOVICH, Bernardo HIGUERA Guerrero, Uriel  
3 ZELAYA, Omar VALTIERRA, Jerry Austin RODRIGUEZ Jaime, Joshua  
4 MENDIOLA, Alex HUBLY, David HUBLY, Megan CHAPMAN, Charles JOSLYN,  
5 Shalesha HUDSON, Tim CRAWFORD, Kurtis NEMEYER, Lindsay NEMEYER,  
6 Natasha DJORDJEVIC, Corey RILEY, Julia CAMMEL, Larry SWEITZER, Oscar  
7 CARRILLO, Gregory WERBER, Frances JUAREZ Castillo, Agustin JUAREZ Castillo,  
8 Edgar CABRERA, Constantino MARES Garcia, and others known and unknown, are  
9 operating. This organization is referred to as the CASTRO DTO and is predominantly  
10 involved in the trafficking of high-purity heroin, counterfeit oxycodone pills, and  
11 methamphetamine. This investigation started as a local drug investigation by the  
12 Bremerton Police Department in August 2017, and has been expanding in scope ever  
13 since that time.

14 6. During this extensive investigation, agents have conducted multiple  
15 controlled and undercover purchases of heroin (totaling around 500 grams) using a  
16 confidential source and an undercover agent; conducted hundreds of hours of physical  
17 and electronic surveillance; installed tracking devices on several target vehicles and  
18 tracking devices/pen registers on several target telephones; used mounted surveillance  
19 cameras to watch the activities at several significant DTO locations; executed several  
20 search warrants on Facebook accounts used by the CASTROs to aid in their distribution  
21 of heroin in Western Washington; identified several high-level international drug  
22 traffickers in Sinaloa, Mexico, with direct ties to Western Washington; executed a  
23 delayed-notice search warrant at a DTO stash apartment and a similar delayed-noticed  
24 search warrant at two DTO storage units; and have obtained authorization to intercept  
25 wire and electronic communications over several different telephones used by multiple  
26 members of the CASTRO DTO in Western Washington.  
27  
28

#### IV. SOURCES OF INFORMATION

7. I have obtained the facts set forth in this Affidavit through my personal participation in this investigation, and from my review of intercepted calls, oral and written reports of other law enforcement officers participating in this and related investigations, and records, documents, and other evidence obtained during this investigation. Since this Affidavit is being submitted for the limited purpose of obtaining search warrants for the residences and vehicles identified above and in Attachments A and A1 to A89, I have set forth only the facts that I believe are necessary to establish probable cause for these warrants.

8. This Affidavit also sets forth facts and information obtained from intercepted communications that were conducted primarily in the Spanish language. Spanish-speaking monitors documented the content of these communications and prepared line sheets summarizing them. The intercepted communications discussed herein include the summaries of pertinent portions as prepared by the monitors, and are not necessarily the entire conversations between the parties involved.

9. Through my training and experience, I know that individuals involved in the distribution of controlled substances and other criminal activity often use coded words and vague terms when referring to illegal activity. When such words were used in the instant investigation, I used this training and experience, along with facts obtained throughout the entirety of this investigation, to include what I believe to be an accurate translation of these coded words and vague references in parentheses throughout this Affidavit.

10. As part of the instant investigation, investigators received information about the CASTRO DTO from two confidential sources as described below.

11. Confidential Source One (CS1) agreed to cooperate with law enforcement in 2017, in exchange for judicial considerations. CS1 was arrested by members of the Bremerton Police Department Special Operations Group (SOG) for his/her involvement in drug trafficking. CS1 cooperated with SOG and provided them with information about



1 a group of Mexican drug traffickers who were distributing large amounts of heroin in the  
2 Puget Sound region. CS1 advised SOG that he/she had been selling various controlled  
3 substances for several years and had been in contact with several of the people within this  
4 group of Mexican drug traffickers (the CASTRO DTO). CS1 spoke to SOG about a  
5 now-prominent member of the DTO whom the CS knew as "Juan" or "Jose." The CS  
6 believed the individual he/she knew as "Juan/Jose" was the local leader of the DTO at the  
7 time when "Juan/Jose" and the CS had originally met several years ago, and believed  
8 "Juan/Jose" was more recently promoted to a larger role in the DTO.

9 12. CS1 told members of SOG that "Juan/Jose" used Facebook to communicate  
10 with the CS and many other heroin distributors. Bremerton Police Detective (Det.)  
11 Jordan Ejde located a Facebook account under the name of "Juan Andres Castro  
12 Valenzuela" with which CS1 and other local suspected drug dealers were associated.  
13 Det. Ejde questioned CS1 about the account and CS1 confirmed "Juan Andres Castro  
14 Valenzuela" was the male whom he/she referred to as "Juan" or "Jose." CS1 also  
15 showed Det. Ejde messages confirming that Juan CASTRO was in contact with CS1,  
16 using the account in his (Juan Castro's) name. According to CS1 and the Facebook data  
17 he/she provided, he/she has been talking to Juan Castro via Facebook Messenger for  
18 purposes of making drug transactions since the summer of 2016.

19 13. A review of CS1's Facebook account showed Juan Castro also contacted  
20 CS1 from additional Facebook accounts under the names of "Rebeca Spencer," "Annel  
21 Baker," and "Katherine Thomas." A review of CS1's phone showed Juan Castro  
22 additionally used Mexican phone numbers 52-668-199-4039 (TT1), 52-668-248-4230,  
23 52-668-225-5890, and 52-668-199-5533 (TT2) to communicate with CS1 via text  
24 message and voice calls. The "Katherine Thomas" Facebook account and TT1 were Juan  
25 Castro's most current methods of drug related communications with CS1 at the time  
26 he/she provided the initial information to SOG.

27 14. Utilizing CS1, SOG conducted six controlled purchases of suspected heroin  
28 from Juan Castro through DTO courier Jesus Rene SARMIENTO Valenzuela (aka



1 “Miguel”), totaling approximately 90.4 grams. Prior to and after each controlled  
2 purchase of heroin, detectives searched CS1 and his/her vehicle, and provided CS1 with  
3 pre-recorded SOG funds to make each purchase. During the course of each controlled  
4 purchase, detectives maintained surveillance on CS1. After each purchase, detectives  
5 tested the suspected heroin using a NIK test kit with presumptive positive results for the  
6 presence of heroin, and then processed the heroin according to SOG’s policies and  
7 procedures. For the second through sixth controlled purchases, detectives recorded the  
8 buys with a covert surveillance camera.

9 15. SOG and DEA began their joint investigation into the CASTRO DTO in  
10 the fall of 2017 and used CS1 to make another (seventh) controlled purchase of heroin  
11 from the CASTRO DTO. CS1 continued to provide agents with updated information on  
12 the DTO’s communications methods/platforms and, as detailed later in this Affidavit,  
13 CS1 was able to introduce an undercover DEA agent (UC) to the CASTRO DTO towards  
14 the end of 2017.

15 16. Unfortunately, CS1 was battling heroin addiction for most of the time  
16 he/she was working with agents. After the seventh controlled purchase with CS1 (the  
17 first in which the DEA was involved), which took place toward the end of October 2017,  
18 agents provided CS1 with cash reimbursement for his/her expenses after the purchase  
19 was completed. After this, CS1 and agents parted ways; agents assumed CS1 would  
20 travel back to his/her residence. Unfortunately, agents conducting surveillance of the  
21 CASTRO DTO couriers after the controlled purchase noticed CS1 returned to meet with  
22 one of the couriers and seemed to conduct another, unsanctioned, drug transaction.  
23 Agents later questioned CS1 about this encounter and he/she was immediately truthful.  
24 CS1 told agents he/she had gone back to obtain a user amount of heroin. CS1 said being  
25 in the presence of heroin during the controlled purchase was enough of a temptation to  
26 ignite CS1’s urge to use the drug personally. CS1 also told agents how he/she had  
27 previously taken (and later used) small portions of the heroin from some of the controlled  
28 purchases SOG had done prior to DEA’s involvement. Obviously, such behavior is

1 against law enforcement policies regarding confidential sources and their use in an  
2 investigation.

3 17. Agents spoke with CS1 about the dangers he/she faced by committing such  
4 crimes while working for law enforcement. After this discussion, CS1 told agents he/she  
5 wanted to continue to work for law enforcement (if allowed); he/she said it was very  
6 important to CS1 that he/she help take the CASTRO DTO's drugs off the streets. CS1  
7 described his/her addiction to heroin as one of the strongest mental struggles a person  
8 would ever have to deal with. From my training and experience, I know CS1's  
9 statements regarding the struggle against heroin addiction to be true. CS1 told agents  
10 he/she would be willing to enter into a drug rehabilitation program or do whatever it took  
11 to get past this addiction and help law enforcement take down the CASTRO DTO while  
12 doing so. Together, agents and CS1 developed a method of helping CS1 to combat  
13 his/her addiction while helping the investigation.

14 18. Agents provided CS1 with access to drug treatment programs and got CS1  
15 enrolled in a rehabilitation center; they even arranged for atypical expense  
16 reimbursements for CS1. Rather than cash reimbursement for expenses incurred during  
17 government operations, agents provided CS1 with food cards or gasoline—things that  
18 were not readily convertible into cash. Agents did so at the request of CS1, so he/she  
19 would not be tempted to purchase drugs with any excess money. These methods worked  
20 for a time.

21 19. CS1 successfully completed several months of his/her rehabilitation  
22 program before staff asked CS1 to leave due to his/her attitude problems and problems  
23 with other rehabilitation patients. CS1 continued to help agents by providing information  
24 about the DTO and helping to build the UC's reputation. However, CS1 relapsed into  
25 heroin use in the spring of 2018. This time, CS1 quite rapidly spiraled downward into an  
26 almost paranoid and delusional state. Agents determined they could no longer use CS1  
27 for any investigative purposes, but tried once again to get CS1 some help with his/her  
28 drug problem. Unfortunately, CS1 was not as amenable on this occasion and shunned

1 agents' attempts at providing assistance. In May 2018, local police arrested CS1 and  
2 charged him/her with residential burglary (felony) and driving with a suspended or  
3 revoked license (misdemeanor). SOG deactivated CS1 in May 2018 due to CS1's  
4 substance abuse issues. However, agents found CS1's information to be reliable during  
5 the time agents utilized him/her to gather information.

6 20. CS1's criminal history includes a felony conviction for  
7 Manufacture/Deliver a Schedule I/II Narcotic in 2013, gross misdemeanor convictions  
8 for Fourth Degree Assault in 2015 and Third Degree Malicious Mischief in 2011, as well  
9 as misdemeanor convictions for Third Degree Driving With a Suspended or Revoked  
10 License in 2018 and 2008, Indecent Exposure in 2013, and Third Degree Malicious  
11 Mischief in 2006.

12 21. Confidential Source Two (CS2) initially agreed to cooperate with law  
13 enforcement in exchange for charging considerations, i.e., not being charged. CS2 began  
14 working with members of the Kent Police Department (KPD) in November 2017. CS2  
15 completed this initial arrangement with KPD successfully and has since been working  
16 with members of KPD for monetary gain. CS2 has completed multiple controlled  
17 purchases with KPD; during each purchase, CS2 was searched prior to and after the  
18 transaction for contraband with negative results, and in each case CS2 returned with the  
19 anticipated quantity of drugs. In the past two years, prior to working with KPD, CS2 has  
20 successfully worked with the Seattle Police Department (two controlled purchases) and  
21 the King County Sherriff's Office (one controlled purchase). Most recently, CS2 has  
22 provided KPD with information about a DTO operating in King County, Washington,  
23 and has conducted controlled purchases from this DTO.

24 22. During the second week of December 2017, the KPD's Special  
25 Investigation Unit (SIU) completed the first controlled purchase from a drug trafficker  
26 known to them at the time as "Pedro." Pedro was later identified in SIU's investigation  
27 as Pedro Vasquez Juarez and his residential address was identified through physical and  
28 electronic surveillance as a location in Auburn, Washington. CS2 told SIU members

1 Vasquez was a "runner" (i.e., drug/money courier) for a local drug trafficking  
2 organization. The King County Sheriff's Office, who also had knowledge of the group  
3 and various details about this organization, later corroborated this information.

4 23. CS2 sent a text message to 559-514-3664 (Vasquez's phone at that time) in  
5 presence of SIU members, requesting an amount of heroin known to investigators. About  
6 ten minutes later, Vasquez responded and agreed to sell drugs to CS2. SIU subsequently  
7 conducted the controlled purchase with CS2 (which took about 30 seconds) and  
8 confirmed Vasquez was the deliveryman for that transaction. The substance Vasquez  
9 delivered weighed 24.89 gross grams with packaging and field-tested positive for the  
10 presence of heroin.

11 24. During the third week of January 2018, KPD used CS2 to conduct a second  
12 controlled purchase from Vasquez. SIU Detective Elizabeth Yagi monitored CS2 as CS2  
13 placed text messages and a phone call to 559-514-3664, Vasquez's phone number at that  
14 time. From these communications, Vasquez agreed to conduct a drug transaction with  
15 CS2. Vasquez and CS2 conducted another drug transaction (while under surveillance by  
16 SIU). The substance obtained by CS2 was later found to weigh 11.16 gross grams with  
17 packaging and field-tested positive for the presence of heroin.

18 25. Later in January 2018, SIU noticed service to Vasquez's phone (559-514-  
19 3664) had been discontinued. CS2 advised SIU Vasquez had indeed switched to another  
20 phone number, 206-380-2481. Upon looking through communications on CS2's phone  
21 with Vasquez's new number (206-380-2481), SIU noted there was at least one  
22 conversation they recognized, through training and experience, to be drug-related in  
23 nature; CS2 confirmed this suspicion. DEA agents later provided information to SIU that  
24 further corroborated CS2's information.

25 26. Agents in this investigation initially identified 206-380-2481 as a relevant  
26 phone number through telephone tolls analysis of CASTRO DTO phones (namely Daniel  
27 Osvaldo ROCHA Lopez's phones, including TT24). Agents believed 206-380-2481 was  
28 a likely criminal associate of ROCHA's based on their communications history. Agents

1 searched this phone number through law enforcement databases and discovered SIU's  
2 ongoing investigation into Vasquez. Agents served an administrative subpoena on 206-  
3 380-2481's service provider, Sprint, and found the phone is actually subscribed to Pedro  
4 Vasquez at his known address in Auburn, Washington. Service to this device began on  
5 July 28, 2017. Agents provided this information to SIU.

6 27. Agents continued their telephone tolls analysis of TT24 and other CASTRO  
7 DTO phones throughout June and into July 2018, and discovered another top contact of  
8 TT24: 206-841-5082. Agents served an administrative subpoena on 206-841-5082's  
9 service provider, which was also Sprint, and found the phone was *also* subscribed to  
10 Pedro Vasquez —though this phone number was registered at a default, prepaid address  
11 for Sprint phones. Service to this device began on June 12, 2018. Though ROCHA had  
12 communicated with Vasquez's prior numbers, he had communicated most recently (at  
13 that time) with Vasquez's newest phone number (206-841-5082). Agents provided this  
14 additional information to SIU and they corroborated agents' beliefs based on information  
15 obtained through their independent investigation.

16 28. I believe the information CS2 has provided to KPD SIU about Pedro  
17 Vasquez is accurate and reliable.

18 29. CS2 has criminal convictions that span five states, and include Possession  
19 of Stolen Property; Violation of the Uniform Controlled Substances Act; Receiving  
20 Stolen Property; Fraud; two counts of Aggravated Theft; felony Possession of Drugs;  
21 Failure to Comply with Police; Drug Possession; Receiving Stolen Property; felony  
22 Grand Theft; Conspiracy to Commit Grand Theft Auto; Delivery of Controlled  
23 Substance; Controlled Substance Delivery (Marijuana); felony Theft; felony Escape;  
24 three counts of Theft by False Promise; and felony Theft.

## 25 V. SUMMARY OF INVESTIGATION

26 30. During the instant investigation, which has spanned over a year,  
27 investigators have identified several locations in Western Washington that are believed to  
28 be used in the facilitation of the CASTRO DTO's drug trafficking and money laundering

1 activities. The following summary of this investigation is offered in support of my belief  
2 that probable cause exists to believe that these residences, including outbuildings and  
3 vehicles located within the curtilage of same, contain evidence, fruits and/or  
4 instrumentalities of drug trafficking and money laundering crimes committed by the  
5 CASTRO DTO in violation of Title 21, United States Code, Sections 841(a)(1), 843(b),  
6 846, and 952, and Title 18, United States Code, Sections 924(c), 1956, and 1957.

7 31. The intercepted calls, surveillance observations, real-time tracking data,  
8 confidential source information, and enforcement activities described herein do not  
9 encompass all of the information collected concerning the instant investigation. Rather, I  
10 have set forth only the facts that I believe are essential to establish the necessary  
11 foundation for the issuance of the requested search warrants. As such, I have included in  
12 this Affidavit several examples of drug trafficking activity as they relate to each location,  
13 which is highlighted in bold text. Some of these examples also encompass drug  
14 trafficking activity as it relates to specific vehicles that investigators seek authorization to  
15 search. Where those vehicles are discussed in this Affidavit, the description  
16 (color/make/model) and license plate of the respective vehicle and/or its Target Vehicle  
17 number (if one was assigned) is highlighted in bold text. The information and examples  
18 below are only a representative sample of the evidence gathered during the entire  
19 investigation.

20 a. ***Bremerton Police Develop a Confidential Source***

21 32. During the month of August 2017, the Bremerton Police Department  
22 Special Operations Group (SOG) was investigating a suspected local heroin dealer  
23 reportedly purchasing heroin from a Hispanic individual in the Snohomish and King  
24 County areas. SOG conducted controlled buys from the local dealer, and eventually  
25 detained him/her during a traffic stop. During the stop, detectives discovered a large  
26 amount of cash, which the dealer claimed he/she owed as a drug "front" to a Mexican  
27 drug trafficking organization (DTO). The dealer then agreed to cooperate with law  
28



1 enforcement; SOG signed up the dealer as Confidential Source 1 (CS1). I have provided  
2 details regarding SOG's initial interactions with CS1 in Section IV of this Affidavit.

3 33. As described in Section IV, utilizing CS1, SOG conducted six controlled  
4 purchases of suspected heroin from CASTRO through Jesus Rene SARMIENTO  
5 Valenzuela, totaling approximately 90.4 gross grams.<sup>2</sup> The first two of these buys  
6 occurred in August 2017, the next three were in September 2017, and the last one took  
7 place at the beginning of October 2017. During these controlled purchases investigators  
8 observed SARMIENTO driving a red Volkswagen Jetta bearing Washington plate  
9 BFX7429 (Target Vehicle 1 or TV1). After the second controlled buy, investigators  
10 observed SARMIENTO conduct the transaction in the parking lot of **Soltero's Market**  
11 **Mexican Store, 24202 104th Ave. SE, Unit 104, Kent, Washington**. Investigators then  
12 observed SARMIENTO walk into **Soltero's Market Mexican Store, 24202 104th Ave.**  
13 **SE, Unit 104, Kent, Washington**, following the completion of the deal. Agents also saw  
14 SARMIENTO walking into **Soltero's Market Mexican Store, 24202 104th Ave. SE,**  
15 **Unit 104, Kent, Washington**, just prior to the fifth controlled buy, which occurred in the  
16 parking lot of **Soltero's Market**.

17 b. ***SOG and DEA Begin their Joint Investigation into the CASTRO***  
18 ***DTO***

19 34. After uncovering the Facebook information provided by CS1 with its  
20 seemingly direct connection to Mexico, Det. Ejde began working with Special Agent  
21 Anthony DelVecchio to further the scope of SOG's initial investigation. When members  
22 of DEA and SOG (referred to throughout this Affidavit as "agents") first came across this  
23 Facebook-related information, they were only able to view the public Facebook profile  
24 information of these accounts (such as the accounts' listed "friends"). Even from this  
25

---

26 <sup>2</sup> The first six controlled buys performed by SOG totaled approximately 90.4 grams of suspected heroin. The  
27 seventh buy SOG conducted was done in conjunction with DEA, and agents obtained 46.2 gross grams of suspected  
28 heroin during this seventh purchase, for 136.6 gross grams total between the first seven controlled purchases from  
this DTO using CS1.

1 limited information, agents could see that there were many mutual friends among these  
2 accounts. The accounts' listed friends included Jerry Austin RODRIGUEZ Jaime,  
3 Natasha DJORDJEVIC, Alex HUBLY, David HUBLY, Blake HYNEK, Megan  
4 CHAPMAN, Charles JOSLYN, Shalesha HUDSON, and others, all of whom have  
5 criminal histories involving drug crimes, which corroborated CS1's information about  
6 Juan Castro's use of these Facebook accounts specifically for drug trafficking purposes.  
7 Agents believed these individuals (and others) were the local heroin distributors for the  
8 CASTRO DTO based on the information provided by CS1, the criminal histories of these  
9 Facebook friends, and agents' training/experience. Subsequent physical and electronic  
10 surveillance furthered these suspicions.

11 35. Det. Ejde and Agent DelVecchio confirmed Juan Castro's identity via  
12 records contained in the Washington Department of Licensing (WADOL) database.  
13 Specifically, Juan Castro's WADOL photograph matches that of the individual on the  
14 "Juan Andres Castro Valenzuela" Facebook account. Furthermore, according to a law  
15 enforcement database, Juan Castro was involved as a suspected "cell head" for heroin  
16 distribution in the Everett area during a DEA investigation that took place in 2012.  
17 Special Agent DelVecchio researched this prior DEA case and found Juan Castro was, in  
18 fact, the primary target of investigation in that case. Agents seized multiple kilograms of  
19 heroin in that investigation, but did not arrest Castro.

20 36. Juan Castro used the aforementioned Facebook accounts, as well as various  
21 telephone numbers, to set up drug deals with CS1. According to CS1, Juan Castro  
22 typically arranged the transaction, but sent another Hispanic male to conduct the  
23 transaction with CS1. CS1 explained that he/she has met several different Hispanic  
24 males across the Puget Sound region to conduct these drug transactions. CS1 told law  
25 enforcement he/she typically purchased 1-2 ounces of heroin several times per week.

26 37. CS1 met with a Hispanic male whom CS1 knew as "Miguel" during many  
27 of his/her controlled purchases with SOG. Agents positively identified "Miguel" as Jesus  
28 Rene SARMIENTO Valenzuela by comparing surveillance photographs of CASTRO



1 DTO members, photographs on SARMIENTO's Facebook account, and SARMIENTO's  
2 visa information from the United States Department of Homeland Security.

3 38. In late October 2017, members of the DEA Tacoma Resident Office (TRO)  
4 and SOG conducted a controlled purchase of heroin from the CASTRO DTO using CS1.  
5 This was the seventh overall controlled purchase from the DTO. Agents conducted  
6 surveillance of the DTO before and after this purchase, and searched CS1 and CS1's  
7 vehicle for contraband before and after the purchase with negative results. Agents  
8 watched SARMIENTO make a suspected drug delivery and subsequent money transfer,  
9 as well as conduct the controlled purchase with CS1. Before and immediately following  
10 this controlled buy, agents observed SARMIENTO drive TV1 to **Soltero's Market**  
11 **Mexican Store, 24202 104th Ave. SE, Unit 104, Kent, Washington.** Additionally,  
12 agents observed SARMIENTO with a then-unidentified Hispanic male and suspected  
13 heroin distributor; agents later identified that Hispanic male as Carlos Eduardo LOPEZ  
14 Hernandez. These early observations of SARMIENTO and LOPEZ were agents' first  
15 look at LOPEZ as the driver of a silver Honda Civic bearing Washington license plate  
16 BEX3964 (Target Vehicle 2 or TV2).

17 c. ***DEA Begins Undercover Operations from the CASTRO DTO***

18 39. After this seventh controlled purchase, CS1 was able to introduce a DEA  
19 Undercover Agent (UC) to the CASTRO DTO via a conversation over Facebook  
20 Messenger (with the Katherine Thomas Facebook account). The UC was able to conduct  
21 three purchases of heroin from the CASTRO DTO, through SARMIENTO, before the  
22 end of 2017. SARMIENTO used TV1 during each of these transactions and they all took  
23 place in public parking lots. Prior to the first undercover purchase, agents identified a  
24 trailer located at **22025 100th Ave. SE, Kent, Washington,** as SARMIENTO and  
25 LOPEZ's residence.

26 40. During the first purchase, the UC used a combination of communications  
27 over Facebook Messenger (with the Katherine Thomas account), TT1, and TT3 to  
28 complete the transaction. Agents saw SARMIENTO leaving the **22025 100th Ave. SE,**

1 **Kent, Washington**, residence, via a mounted surveillance camera, prior to this purchase.  
2 SARMIENTO went to **Soltero's Market Mexican Store, 24202 104th Ave. SE, Unit**  
3 **104, Kent, Washington**, where agents saw, via a mounted surveillance camera, him go  
4 in before leaving to conduct the purchase with the UC. SARMIENTO delivered about  
5 49.5 grams (net weight) of a substance analyzed by the DEA Western Regional  
6 Laboratory (WRL) and found to be 30-34% pure heroin. This is the typical purity level  
7 for high-purity heroin in Western Washington. Via GPS tracking, agents followed  
8 SARMIENTO back to the **22025 100th Ave. SE, Kent, Washington**, residence  
9 following the completion of the purchase. During the UC's second purchase, he/she  
10 communicated with the DTO through the Katherine Thomas Facebook account and TT1.  
11 SARMIENTO delivered about 99.3 grams (net weight) of a substance analyzed by the  
12 DEA WRL and found to be 41-47% pure heroin. This purity level was higher than the  
13 typical purity level for high-purity heroin in Western Washington. Due to this  
14 unexpected purity, agents opted to see if the DTO could provide heroin of equal quality  
15 in powder form. The UC conducted a third transaction with the DTO in December 2017.  
16 Again, the UC communicated with the CASTRO DTO over the Katherine Thomas  
17 Facebook account and TT1, and SARMIENTO delivered the drugs using TV1. Again,  
18 agents observed, via mounted surveillance cameras at both locations, SARMIENTO  
19 leave the **22025 100th Ave. SE, Kent, Washington**, residence and travel to **Soltero's**  
20 **Market Mexican Store, 24202 104th Ave. SE, Unit 104, Kent, Washington**, before  
21 conducting the transaction. SARMIENTO delivered about 49.7 grams (net weight) of a  
22 substance analyzed by the DEA WRL and found to be 33-37% pure heroin. This was  
23 back to the typical purity level agents have encountered for high-purity heroin in Western  
24 Washington.

25 41. During this third undercover purchase, SARMIENTO told the UC he would  
26 be returning to Mexico in the near future. Sure enough, agents used physical and  
27 electronic surveillance means later in December 2017 to watch SARMIENTO leave  
28 Washington and head to Mexico. On December 24, 2017, Juan Castro contacted the UC

1 through Facebook Messenger, using the Katherine Thomas account. Juan Castro  
 2 explained to the UC that his cousin, "Luis" would be the point of contact for any  
 3 immediate deals the UC required. Castro told the UC he/she could contact "Luis" via  
 4 phone number 206-698-1965 (Target Telephone 4 or TT4), but not over Facebook  
 5 Messenger. The following transcript reflects the referenced discussion between Juan  
 6 Castro and the UC on December 24, 2017:

7           • CASTRO: "good morning, if you need something please call or  
 8 send text to my cousin Luis: 2066981965 (not messenger)"

9           • UC: "Good morning amigo, thank you for that. I will be in Ohio  
 10 with family for the holidays for the next couple weeks. Is there someone there that  
 11 can do business?"

12           • CASTRO: "maybe"

13           • UC: "Ok, good"

14       42. The UC then made contact with "Luis" over TT4 in mid-January 2018, but  
 15 the two were not able schedule a drug transaction. The UC contacted Juan Castro on the  
 16 Katherine Thomas Facebook account and confirmed "Luis" was, in fact, the new courier;  
 17 Juan Castro told the UC to just contact him (Castro) directly and he would handle the  
 18 specifics with "Luis."

19       43. Shortly thereafter, agents received hundreds of pages of Facebook account  
 20 information from the Katherine Thomas account, pursuant to a federal search warrant.  
 21 This information received from Facebook clearly showed use of the Katherine Thomas  
 22 account for drug trafficking purposes, just as agents had suspected. Agents later received  
 23 court authorization to search additional accounts associated with the CASTRO DTO and  
 24 found very similar data of evidentiary value. The following review of the Katherine  
 25 Thomas Facebook account will serve as an example of the types of data/information and  
 26 content agents received from the search warrants later executed on additional CASTRO  
 27 DTO accounts.  
 28

1           d.       *A Brief Review of the Katherine Thomas Facebook Account*

2           44.     Facebook records showed account number "100021806071829," which is  
3 associated with the vanity name of "Katherine.thomas.104418," was registered on August  
4 24, 2017, at 19:19:37 UTC. As of January 2018, Facebook records showed the account  
5 was still active. The verified cell phone number associated with this account was  
6 "+526681994039" (TT1), which was verified through Facebook on the day the account  
7 was established. Facebook records showed a listing of internet protocol (IP) addresses  
8 captured during different activities on Facebook (such as logging in or sending an  
9 attachment). DEA Resident Agent in Charge (RAC) Ian McKenzie conducted an IP  
10 lookup and found the majority of the IP addresses associated with this Facebook account  
11 were static IP addresses located in Los Mochis, Sinaloa, Mexico. This information is  
12 consistent with information received from CS1 as well as agents' own information  
13 gathering efforts regarding Juan Castro's location.

14           45.     These records also showed three linked accounts used by the same digital  
15 device/computer: Katherine Thomas (100021806071829), Florencio Castro Valenzuela  
16 (100006465750228), and Annel Baker (100017854953772). Agents had separately  
17 established this same connection between these accounts based on CS1's information and  
18 their own records searches. Agents know the CASTRO DTO used the Annel Baker  
19 account previously in the same manner as they used the Katherine Thomas account,  
20 based on CS1's information.

21           46.     Facebook records showed the listed date of birth on the Katherine Thomas  
22 account as "02/24/1990." Juan Castro's criminal record lists his date of birth as February  
23 24, 1986. Agents suspect the common birthdate of "February 24" between the Katherine  
24 Thomas Facebook account and Juan Castro is no coincidence, and that Castro most likely  
25 used it because it is a date he can easily remember.

26           47.     These Facebook records also list all of Juan Castro's Facebook friends  
27 associated with this particular account and their Facebook account numbers. Agents have  
28 identified all of these Facebook friends based on their names and Facebook photographs,

1 and a comparison with WADOL records. Agents have conducted surveillance on many  
 2 of the individuals listed below, along with law enforcement research on these individuals,  
 3 and suspect, based on agents' physical surveillance observations, they are heroin  
 4 distributors for the CASTRO DTO in Washington. The Facebook Messenger portion of  
 5 the records received from Facebook also corroborated agents' suspicions regarding these  
 6 individuals. As expected, the UC's Facebook account is also listed in this section of the  
 7 report. Some of the listed "friends" for the Katherine Thomas account are as follows:

- 8 • Megan CHAPMAN (100016721526235)
- 9 • Charles JOSLYN (100013322561905)
- 10 • Shalesha Renee [HUDSON] (1510578017)
- 11 • Blake HYNEK (100000545221409)
- 12 • Alex HUBLY (100016996650297)
- 13 • Jay A JAIME [Jerry Austin RODRIGUEZ Jaime] (100001871793095)
- 14 • David HUBLY (100012023506652)
- 15 • Natasha DJORDJEVIC (100000861552774)

16 48. Facebook records also showed which people Juan Castro had sent a "friend  
 17 request" to or received a "friend request" from on the Katherine Thomas account. These  
 18 records included those individuals listed above. The following list shows some of those  
 19 who either received but did not respond to Juan Castro's Facebook friend request or  
 20 outright rejected Juan Castro's Facebook friend request, indicating they may have  
 21 distributed heroin with Juan Castro in the past, but no longer wished to do business with  
 22 him, were using an alternate Facebook account, or did not recognize the new Facebook  
 23 account Juan Castro was utilizing:

- 24 • Tim CRAWFORD (100007321574979)
- 25 • Tim CRAWFORD (100000859215933)
- 26 • Alex Annala [HUBLY] (100008229828661)
- 27 • Alex Annala [HUBLY] (100006281329451)
- 28

- Megan CHAPMAN (100002260914787)

49. The last portion of the Facebook records was a chronological listing of messaging strings, separated by individual Facebook accounts. These messaging strings were similar to text message conversations commonly found on mobile phones, though these messaging conversations were between the Katherine Thomas account and the Facebook friends listed above (the suspected heroin distributors for the DTO). Agents conducted a review of the messaging section of the Katherine Thomas account records and noted some key items of information that were relevant to the investigation, with particular regard to some of the CASTRO DTO members discussed in this Affidavit, as described in the following paragraphs.

50. Josh MENDIOLA: On December 2, 2017, MENDIOLA introduced himself to Juan Castro as "Jay's friend." Agents believe MENDIOLA was referring to Jerry Austin RODRIGUEZ Jaime based on MENDIOLA's description of RODRIGUEZ's then-residence, 10723 59th Ave. E, Puyallup, Washington. MENDIOLA also provided Castro with a description of his vehicle, a white Nissan Maxima, and his address (**7111 193rd St. East, Spanaway, Washington**). This information coincides with MENDIOLA's known address based on WADOL records and public records searches; as explained further in Sections VII (dd) & (ee), it appears MENDIOLA was living with Jake WILSON at that address at that time but is now residing elsewhere. On December 20, 2017, Castro sent MENDIOLA a picture of Castro's new "cousin" who would be arriving in the United States soon to deliver heroin in the place of Jesus SARMIENTO. Agents reviewed this picture and positively identified Arturo FRIAS Ceballos as the individual in the photograph, whom Castro was calling "Luis." On December 23, 2017, MENDIOLA sent a message to Castro which read, "I have been slowing down and laying low hese [sic] last couple days. One of my dealers go [sic] caught so been taking it easy..." Two days after this messaging exchange, MENDIOLA sent additional communications to Castro that complained about the quality of Castro's heroin. As agents continued to look through other messaging

1 exchanges with Castro, they noticed others were also complaining about the heroin  
2 quality around that same time. In their review of additional messages between  
3 MENDIOLA and Castro, agents noticed MENDIOLA referred Castro to the location of  
4 13308 Meridian East, Puyallup, Washington (a Safeway parking lot where agents had  
5 followed Castro's courier to previously), discussed heroin pricing with Castro, and used  
6 coded language to order heroin (using phrases like "ready for dark").

7 51. From these Facebook records, agents can account for Juan Castro supplying  
8 MENDIOLA with no less than 330 grams of heroin in one month's time.

9 52. Allex HUBLY: On December 14, 2017, HUBLY asked Juan Castro about  
10 the "blue pills" and if she could have more of those pills from Castro. Castro said he was  
11 sold out but would have more on "Saturday." HUBLY asked if the pills were "for sure  
12 real," and Castro replied, "Ilok [sic], this pills are manufactured in clandestine  
13 laboratories, these are not pharmaceutical." Agents believe HUBLY and Castro were  
14 likely discussing counterfeit oxycodone pills, based on HUBLY's specificity with regard  
15 to the color of the pills. On November 24, 2017, HUBLY sent Castro a police report that  
16 involved Blake HYNEK and another individual. Based on that messaging conversation,  
17 agents believe HYNEK likely introduced HUBLY to Castro, similar to the way HYNEK  
18 introduced CHAPMAN to Castro.

19 53. From these Facebook records, agents can account for Juan Castro supplying  
20 Allex HUBLY with no less than 561 grams of heroin in less than two months.

21 54. Jerry Austin RODRIGUEZ Jaime: During a Facebook Messenger  
22 conversation on November 27 and 28, 2017, Juan Castro told RODRIGUEZ (using an  
23 account in the name "Jay A Jaime") the "work" was "very slow" and he "needed more  
24 people." I believe this was Castro's way of telling RODRIGUEZ that he (RODRIGUEZ)  
25 needed to sell more heroin or find other distributors to sell more of Castro's heroin.  
26 RODRIGUEZ told Castro, "I have alot [sic] of customers undee [sic] me." Castro  
27 seemed to like RODRIGUEZ's claim of having many drug customers and then offered to  
28 provide RODRIGUEZ with a half-ounce of heroin on a "front." This means Castro was



1 agreeing to provide RODRIGUEZ with the drugs without requiring RODRIGUEZ to pay  
2 for them at the time of delivery.

3 55. On December 1, 2017, RODRIGUEZ provided Juan Castro with his phone  
4 number (253-363-5327). Agents' review of Facebook records found this number to  
5 coincide with RODRIGUEZ's listed phone number. On December 1, 2017,  
6 RODRIGUEZ sent a picture of his house and (then-current) address, 10798 59th Ave.  
7 East, Puyallup, Washington, to CASTRO. Agents have watched TV1 travel to this  
8 residence many times, using physical and electronic surveillance means. On December  
9 4, 2017, CASTRO provided an address to RODRIGUEZ of "23953 104th SE, Kent WA  
10 98031." Agents believe this residence was a possible drug stash house for the CASTRO  
11 DTO, based on these messages. Similar to Castro's activities with MENDIOLA, on  
12 December 20 2017, Castro sent a picture of FRIAS to RODRIGUEZ and told  
13 RODRIGUEZ, "Luis" had just arrived at the airport. From these conversations between  
14 Castro and RODRIGUEZ, RODRIGUEZ seems to prefer his heroin in the form of  
15 "stones" and not "powder" because the heroin is easier for RODRIGUEZ to sell in that  
16 form.

17 56. From these Facebook records, agents can account for Juan Castro supplying  
18 RODRIGUEZ with no less than 247 grams of heroin in just over one month.

19 57. Tim CRAWFORD: On December 22, 2017, Juan Castro messaged  
20 CRAWFORD but never received a response. Castro referred to CRAWFORD as  
21 "amigo," which is the same word Castro used to refer to the UC in this investigation; he  
22 also referred to almost all of his drug customers as "amigos" or "amigas."

23 58. Blake HYNEK: On November 28, 2017, Juan Castro sent a photograph of  
24 court documents to HYNEK. These documents involved HYNEK and another person; it  
25 seemed as though the court paperwork was documenting HYNEK's cooperation with  
26 police regarding an apparent crime the other person had committed. As described above,  
27 agents know Alex HUBLY provided Castro with these materials on November 24, 2017.  
28



1           59. On December 7, 2017, Juan Castro told HYNEK, "we have m-30 pills  
2 (fentanyl)." HYNEK then asked Castro for "pure fentanyl powder," but Castro told  
3 HYNEK "that is too dangerous." During a prior messaging conversation on December 4,  
4 2017, HYNEK offered to provide Castro with fentanyl.

5           60. From the review of Facebook messages between HYNEK and Juan Castro,  
6 and electronic surveillance of TV1, agents believe Castro's couriers often delivered  
7 directly to HYNEK's residence. On December 23, 2017, HYNEK complained to Castro  
8 about the quality of some of the heroin he had received from Castro. HYNEK sent  
9 Castro three photographs of suspected rock heroin, and he did not seem to like this form  
10 of the drug for distribution. Castro told HYNEK the heroin might look different but the  
11 quality was still excellent. HYNEK told Castro that his customers preferred the form of  
12 heroin that was easier to smoke. Castro sent HYNEK a photograph of suspected heroin  
13 powder as a way to confirm with HYNEK that his courier was about to deliver the right  
14 product to HYNEK. HYNEK confirmed the product was what he wanted. Castro  
15 subsequently directed HYNEK to a residence in Kent ("22919 112th Pl SE, Kent, WA  
16 98031") in order to conduct a drug transaction and possible exchange. Castro called this  
17 residence "my house" and said it was "better" for doing the deal. Agents had watched  
18 TV1 travel to this location during surveillance operations. On January 1, 2018, HYNEK  
19 told Castro he had more "clientele" for Castro. He then said, "The clients [sic] name is  
20 Megan chapman [sic]." Castro subsequently informed HYNEK that he "added"  
21 CHAPMAN on Facebook.

22           61. From these Facebook records, agents can account for Juan Castro supplying  
23 HYNEK with no less than 450 grams of heroin in one month's time.

24           62. Megan CHAPMAN: On January 1, 2018, CHAPMAN introduced herself  
25 to Juan Castro as "blakes homegirl"; agents believe CHAPMAN was referring to Blake  
26 HYNEK, based on their knowledge of HYNEK's drug relationship with Castro, the large  
27 drug debt he owed to Castro, and HYNEK's association to CHAPMAN. On the  
28 following day, CHAPMAN provided her phone number to CASTRO as "253-433-9044"

1 and her address as "19914 80th St. Ct E, Bonney Lake, WA 98391." CHAPMAN's  
2 conversation string with Castro confirmed agents' physical observations of TV1 on  
3 January 3, 2018. This messaging string referred to CHAPMAN physically meeting  
4 Castro's drug courier for a drug transaction in which CHAPMAN provided Castro's  
5 courier with \$630. This was one of the only captured exchanges between Castro and  
6 CHAPMAN via Facebook Messenger due to the timing of agents' search warrant  
7 execution; CHAPMAN introduced herself to the organization in January 2018, shortly  
8 before Facebook provided this data to agents.

9       63.    Shalesha Renee [HUDSON]: Agents positively identified Shalesha Renee  
10 as Shalesha Renee HUDSON from her Facebook and WADOL photographs. From these  
11 messages, it looks like HUDSON and Juan Castro's drug relationship began around mid-  
12 November 2017. HUDSON typically ordered multiple pieces of heroin from Castro and  
13 did so on a regular basis. On November 27, 2017, Castro sent HUDSON a photograph of  
14 the court document involving HYNEK and another person, and told her to "beware of  
15 Blake." Castro also asked HUDSON if she was familiar with a man with the initials L.Y.  
16 HUDSON said she was not familiar with that person.

17       64.    HUDSON provided 35703 16th Avenue South, Federal Way, Washington,  
18 as a safe address at which she and Juan Castro's courier could conduct their heroin  
19 transactions; HUDSON indicated this address belonged to one of HUDSON's friends.

20       65.    From December 19 to December 22, 2017, Juan Castro confronted  
21 HUDSON about her buying heroin from other people, which HUDSON acknowledged.  
22 She then ordered one and a half pieces of heroin (approximately 38 grams) from Castro  
23 and had his courier deliver the drugs to her hotel room in Tacoma. Castro sent her a  
24 picture of his "new cousin," FRIAS. After the deal, HUDSON complained to Castro  
25 about the quality of the product and Castro assured her it was "the same." HUDSON  
26 then inquired as to "how much" Castro would charge "for 10 pieces" (approximately 250  
27 grams). Castro replied, "9k," which I believe meant \$9,000.00.  
28

1        66. On December 22, 2017, HUDSON told Juan Castro to send his courier to  
2 HUDSON's "house on 43rd." From the messages that followed, agents determined  
3 HUDSON was referring to a residence near 43rd Street and Portland Avenue East, in  
4 Tacoma, Washington. Agents had seen TV1 travel to this area on several occasions, and  
5 remain in place for short durations of time, consistent with drug trafficking activity.

6        67. From these Facebook records, agents can account for Juan Castro supplying  
7 HUDSON with no less than 675 grams of heroin over the course of a month and a half.

8        68. Charles JOSLYN: On December 27, 2017, Juan Castro and JOSLYN  
9 initiated their Facebook Messenger conversation. JOSLYN told Castro he lived in  
10 Bonney Lake, Washington and said he was "Jessie's cousin." Agents believe JOSLYN  
11 was referring to an individual with the initials J.J.K., based on J.J.K.'s Facebook  
12 friendship with Castro. JOSLYN attempted to call Castro, but Castro did not answer.  
13 Castro then told JOSLYN he does not understand English but is able to use Google  
14 translate. JOSLYN asked Castro if he could supply crystal methamphetamine in addition  
15 to heroin. Castro told him he could only supply "dark," meaning heroin. JOSLYN asked  
16 about Castro's working hours and Castro told JOSLYN that he distributes drugs between  
17 the hours of 8:00 a.m. and 9:30 p.m. JOSLYN and Castro also arranged a drug deal on  
18 this date (one that occurred at the Target store located at 26301 104th Ave. SE, Kent),  
19 during which JOSLYN explained it would be better to do the deal in TV1 because  
20 JOSLYN had brought his children with him and they were in his car already, occupying  
21 space. JOSLYN described his vehicle as a "dark blue 92 Acura legend."

22        69. On December 30, 2017, JOSLYN provided his address to Juan Castro as  
23 "209 21st Ave. SW, Puyallup, Washington"; the conversation suggested the drug  
24 transaction occurred at JOSLYN's residence. JOSLYN seemed to typically receive 12 to  
25 50 grams of heroin at a time from Castro, though on December 30, 2017, JOSLYN  
26 inquired about Castro's pricing on "quarter pounds" or "100 grams." Castro told  
27 JOSLYN it would be \$4,300 and JOSLYN thought that price was too much. JOSLYN  
28 tried to negotiate with Castro and bargain him down to \$3,600 for 100 grams of heroin.

1 From the messaging data agents received, it did not look like Castro ever responded to  
2 that request. TV1 was once again referenced in this conversation string.

3 70. From these Facebook records, agents can account for Juan Castro supplying  
4 JOSLYN with no less than 65 grams of heroin in the span of one week.

5 71. Since execution of the search warrant on the Katherine Thomas account in  
6 January 2018, agents have obtained search warrants for eleven Facebook accounts used  
7 by the Castro brothers: Katherine Thomas, Juan Andres Castro Valenzuela, Florencio  
8 Castro Valenzuela, Annel Baker,<sup>3</sup> Rebeca Spencer, Alissa Keyser, Gina Morris, Chris  
9 Holdford,<sup>4</sup> Rudy Jackson, Steve Larson, and Tom Ryan. All of the accounts were linked  
10 to each other and/or the Castros by information either from CS1, data indicating they  
11 were accessed by the same electronic device, common "friends" lists, or some  
12 combination of the above. All of the search warrants were issued by federal Magistrate  
13 Judges in this District.

14 e. *Agents Identify Juan Castro's New Courier and Conduct another*  
15 *Undercover Purchase*

16 72. Juan Castro sent a picture of SARMIENTO's replacement (whom he called  
17 "Luis") to many of his Washington-based distributors, via Facebook Messenger. These  
18 Facebook records also showed Castro searched for "Luis Ortiz Zavala," "Arturo Zavala,"  
19 and "Arturo Ortiz Zavala," all on the same day, in early December 2017. Agents  
20 suspected these searches reflected Castro's attempts to locate "Luis" on Facebook.  
21 Agents searched law enforcement databases using these names as a way to compare any  
22 photos they found to the photos of "Luis" which Castro had provided to his Washington  
23

---

24  
25 <sup>3</sup> Agents did not receive any results from the search warrant of this account. Facebook representatives said they  
26 could not process the request because the "Annel Baker" account no longer existed and no historical data was  
available.

27 <sup>4</sup> Agents did not receive any messages in the returned materials from Facebook for the Chris Holdford account.  
28 Facebook support personnel stated that one explanation for the absence of data would be that the user deleted all of  
his/her conversations over Facebook Messenger.

1 distributors. Agents were able to identify "Luis" as Arturo FRIAS Ceballos from this  
2 process.

3 73. Agents soon found FRIAS was living with LOPEZ at the DTO's stash  
4 house, **22025 100th Ave. SE, Kent, Washington**, and was driving TV1 just as  
5 SARMIENTO previously had. Agents conducted another undercover purchase of  
6 powder heroin from the DTO at the end of January 2018. FRIAS showed up to the  
7 purchase in TV1 and delivered 87.5 gross grams (with packaging) of suspected heroin to  
8 the UC. This substance field-tested positive for the presence of heroin.

9 74. About a week later, Juan Castro contacted the UC from a new Mexico-  
10 based phone number (52-668-168-7860), but then did not respond to the UC's subsequent  
11 messages. Agents continued to conduct physical and electronic surveillance of FRIAS  
12 and LOPEZ during this time. Agents watched FRIAS make suspected deliveries to many  
13 of the already-identified Washington-based distributors for the DTO, and watched  
14 LOPEZ make routine trips to locations in Seattle and Everett, Washington. Agents  
15 conducted research on these locations and found that one of them, **314 N 133rd St.,**  
16 **Seattle, Washington**, belonged to Rolando ESPINDOLA Hernandez and Jessica  
17 JOHNSON, and the other previously belonged to Jaime HEREDIA Castro.

18 75. Working with their law enforcement counterparts in Snohomish County,  
19 Washington, agents learned ESPINDOLA and JOHNSON had been identified as money  
20 launderers in several prior and unrelated investigations involving Mexican DTOs  
21 operating in Western Washington. Agents also learned HEREDIA was identified during  
22 a previous police investigation as a heroin supplier to several Mexican DTOs operating in  
23 Snohomish and King Counties (in Washington).

24 76. Agents attempted to have the UC purchase fentanyl pills from Juan Castro  
25 in February 2018, but that deal ultimately fell through. Castro also told the UC he would  
26 be traveling up to Washington, through Arizona, in the middle of February 2018. The  
27 UC planned to meet Castro in person during his visit to Washington. Things were  
28 progressing nicely for the UC, considering his/her relatively new status within the DTO.

1 Unfortunately, Castro stopped talking to the UC in mid-February 2018, right after they  
2 made their loose arrangements to meet.

3 77. Agents continued their physical and electronic surveillance of the DTO  
4 members in Washington throughout February, March, and April 2018. They watched  
5 LOPEZ continue to make routine trips up to ESPINDOLA/JOHNSON's residence, **314**  
6 **N 133rd St., Seattle, Washington**, and HEREDIA's previous residence in Everett.  
7 These trips were always of short duration and often LOPEZ would drive directly back to  
8 his residence after these trips. As time went on, FRIAS moved to an apartment complex  
9 in Kent, Washington, and LOPEZ moved to an apartment in Auburn, Washington. The  
10 two continued to use the identified DTO stash house, **22025 100th Ave. SE, Kent,**  
11 **Washington.**

12 78. In March and April 2018, agents executed another search warrant on the  
13 Katherine Thomas Facebook account as well as search warrants on five additional  
14 accounts used by the CASTRO DTO, including accounts in the names of "Gina Morris,"  
15 "Alissa Keyser," "Florencio Castro Valenzuela," and "Juan Andres Castro Valenzuela."  
16 The data retrieved from these Facebook accounts proved to be just as useful as agents'  
17 initial search of the Katherine Thomas account. These records showed the CASTRO  
18 DTO was using the Florencio and Juan Castro Facebook accounts in conjunction with  
19 several other Katherine Thomas-equivalent accounts (i.e., the Gina Morris and Alissa  
20 Keyser accounts) to communicate with local distributors. Agents also executed a search  
21 warrant on TV2 after it broke down and found documentation linking LOPEZ to  
22 HEREDIA inside the abandoned vehicle.

23 79. Agents continued their investigative efforts in this manner for about two  
24 months. The combination of physical and electronic surveillance used in conjunction  
25 with telephone tolls analysis and Facebook research provided agents with a basic  
26 understanding of the CASTRO DTO's operations.

27 80. In April 2018, Juan Castro gave CS1 a phone number for his cousin  
28 "Carlos," and had CS1 assist "Carlos" and FRIAS with registering a vehicle (**a white**



1 **2008 Honda Accord now bearing Washington license BJN4395, i.e., TV3) in**  
2 Washington. In exchange for helping "Carlos" and FRIAS with the vehicle registration,  
3 CS1 received about 50 grams of heroin from them. Through AZ licensing records for the  
4 vehicle (prior to its registration in Washington) and a photograph associated with a 2013  
5 CBP arrest, agents identified "Carlos" as Juan Jose HIGUERA Gonzalez. By the end of  
6 April 2018, the DTO had again cycled out its local members and Daniel ROCHA  
7 replaced Carlos LOPEZ, and Juan HIGUERA replaced FRIAS. In May 2018, agents  
8 identified HIGUERA's phone number (TT19) through tolls analysis, and in June 2018  
9 conducted another UC purchase of heroin from the DTO. HIGUERA, using TT19 and in  
10 TV3, delivered the drugs to the UC. Thus began the wiretap phase of the investigation

## 11 **VI. AUTHORIZED INTERCEPTIONS OF CASTRO DTO MEMBERS**

12 81. On June 27, 2018, the Honorable Ronald B. Leighton, United States  
13 District Judge for the Western District of Washington, signed an Order authorizing the  
14 initial interception of wire and electronic communications over TT19, used by Juan  
15 HIGUERA Gonzalez. The interception of TT19 began on June 27, 2018, and ended on  
16 July 9, 2018. These interceptions helped gather evidence against several local  
17 distributors for the DTO and helped agents obtain court authorization to intercept one of  
18 ROCHA's phones.

19 82. On July 10, 2018, the Honorable Ronald B. Leighton, United States District  
20 Judge for the Western District of Washington, signed an Order authorizing the initial  
21 interception of wire and electronic communications over TT24, a phone used by ROCHA  
22 (at that time, referred to as Jorge Robles Perez). The interception of TT24 began on July  
23 11, 2018, and ended on July 16, 2018, when ROCHA stopped using TT24 following an  
24 unsuccessful surveillance event on July 14, 2018. Despite the short duration of the  
25 interception period, the intercepted communications over TT24 showed ROCHA was  
26 clearly using TT24 to facilitate drug trafficking activities for the CASTRO DTO.

27 83. Agents were able to intercept suspected drug-related communications  
28 between ROCHA (TT24) and other CASTRO DTO members including HEREDIA

(TT25), a man then known only as "Manuel," but later identified as Manuel LOYA Soto (TT27), and a man then known only as "Leo" but later identified as Leonel Sillas Berrelleza (TT28). These intercepted communications clearly identified Sillas as ROCHA's Mexico-based manager and a coordinator for the DTO. The intercepted communications over TT24 helped agents observe a delivery of at least nine kilograms of heroin, 12,000 pills, and an undetermined amount of crystal methamphetamine to ROCHA on July 13, 2018. Agents used the intercepted communications over TT24 in conjunction with physical and electronic surveillance to watch ROCHA, HEREDIA, and LOYA during suspected heroin and pill deliveries. Agents also used intercepted communications over TT24 to anticipate and then observe the activities of these same individuals with great success. Unfortunately, during one such attempt at the coordinated use of intercepted communications over TT24 with surveillance, ROCHA detected an agent's presence. ROCHA then stopped using TT24 entirely at Sillas' direction, changed the location of his drug stash (at least temporarily), and most likely notified HIGUERA, HEREDIA, and LOYA of this incident since HIGUERA and LOYA got new vehicles and phone numbers shortly thereafter.

84. On August 20, 2018, the Honorable Ronald B. Leighton, United States District Judge for the Western District of Washington, signed an Order authorizing the initial interception of wire and electronic communications over TT25, TT31, and TT32, used by Jaime HEREDIA, Daniel ROCHA, and Manuel LOYA, respectively. The interception of wire and electronic communications over TT25 began on August 20, 2018, and ended on August 23, 2018. Agents did not activate the interceptions of TT31 and TT32 because data from pen registers/trap and trace devices and location monitoring indicated ROCHA and LOYA, respectively, were not using those phones by the time agents received court authorization to intercept them. Agents gained little additional information from such a short period of interception over TT25 (HEREDIA). However, agents were able to identify further HEREDIA's position within the DTO, and confirmed



1 some of the unidentified individuals using pre-paid phone numbers in contact with  
2 HEREDIA were for drug trafficking purposes.

3 85. After HEREDIA stopped using TT25, agents located a new phone number  
4 used by HEREDIA and began intercepting wire and electronic communications over  
5 another of ROCHA's phones, TT43. On August 28, 2018, the Honorable Ronald B.  
6 Leighton, United States District Judge for the Western District of Washington, signed an  
7 Order authorizing the initial interception of wire and electronic communications over  
8 TT43 (ROCHA). The interception of TT43 began on August 29, 2018, and ended on  
9 September 4, 2018, though agents believe ROCHA likely stopped using the device on the  
10 morning of September 1, 2018. These interceptions, even for this brief period, greatly  
11 helped agents in their investigation in that they helped identify several previously  
12 unidentified or unknown members of the DTO, and helped identify their roles in the  
13 DTO. These interceptions helped agents anticipate Carlos LOPEZ's return to Western  
14 Washington—and then observe his pick-up at the Seattle-Tacoma International Airport.  
15 Intercepted communications over TT43 also helped agents identify Oscar Humberto  
16 CARRILLO Salcedo (using TT50 at that time) as a bulk cash smuggler for the CASTRO  
17 DTO and served to identify previously unknown high-volume drug distributors for the  
18 DTO such as Hector Manuel URIAS Moreno (then known only as "Teto") and Michael  
19 John SCOTT and his wife, Esther La Rena SCOTT.

20 86. The intercepted communications between the distribution hub for Western  
21 Washington (ROCHA, TT43) and the distribution manager in Mexico (Sillas) provided  
22 agents with a detailed understanding of what types and how much of each drug ROCHA  
23 maintained during the time agents were intercepting communications over TT43. The  
24 intercepted conversations also provided agents with detailed knowledge of how much  
25 money the DTO earned from the sale of their drugs. On one day, ROCHA and Sillas  
26 even carried out a meticulous accounting of all the drugs and money ROCHA was  
27 supposed to have delivered, maintained, or transferred to others over the past month or  
28 so. This meticulous accounting allowed agents to seize those same accounted-for drugs

1 and money from ROCHA's residence when he and LOPEZ were not present.<sup>5</sup> Agents  
2 recovered over a kilogram of suspected heroin, some suspected crystal  
3 methamphetamine, over 3,200 genuine or counterfeit oxycodone pills, and over \$160,000  
4 in cash from this seizure. Agents believe this seizure, on August 31, 2018, is what  
5 ultimately caused ROCHA to stop using TT43 during the morning of September 1, 2018.

6 87. LOPEZ then took over ROCHA's job duties for the DTO in Western  
7 Washington, and ROCHA returned to Mexico shortly thereafter. On September 11,  
8 2018, the Honorable Ronald B. Leighton, United States District Judge for the Western  
9 District of Washington, signed an Order authorizing the initial interception of wire and  
10 electronic communications over HEREDIA's then-current phone (TT46), just after  
11 LOPEZ had reclaimed his role as distribution hub for the DTO in Western Washington.  
12 Interceptions over TT46 began on September 13, 2018, and ended on October 11, 2018.  
13 These intercepted communications almost mirrored the intercepted communications over  
14 TT25 (HEREDIA). HEREDIA used TT46 to facilitate his drug trafficking activities, like  
15 taking heroin and pill orders from his customers and speaking with the Western  
16 Washington distribution hub (Carlos LOPEZ, TT51) about his supply needs. HEREDIA  
17 also used TT46 to speak with other suspected higher-level members of the DTO in  
18 Mexico and money launderers who were previously unknown to agents.

19 88. On September 24, 2018, the Honorable Ronald B. Leighton, United States  
20 District Judge for the Western District of Washington, signed an Order authorizing the  
21 initial interception of wire and electronic communications over URIAS' phone (TT48),  
22 CARRILLO's phone (TT50) and LOPEZ's phone (TT51). Interceptions over TT48 and  
23 TT51 began the same day, and ended on October 17, 2018. Interceptions over TT50  
24 began on September 26, 2018, and ended on September 28, 2018 (although agents  
25

---

26  
27 <sup>5</sup> Agents obtained a delayed-notice search and seizure warrant for ROCHA's residence from the Honorable David  
28 W. Christel, United States Magistrate Judge for the Western District of Washington, on August 31, 2018, and  
executed the warrant that same evening.

1 believe CARRILLO stopped using his telephone on September 26, 2018). The  
2 intercepted communications over TT48 and TT51 helped agents identify over 20  
3 additional members of the DTO, including high-volume heroin, crystal  
4 methamphetamine, and pill distributors in Western Washington; solidify the connection  
5 between Sillas and other high-ranking members of the DTO in Mexico; identify and  
6 gather evidence against bulk drug smugglers from Arizona and California; and, most  
7 notably, identify CARRILLO's new phone (TT62).

8 89. On October 18, 2018, the Honorable Ronald B. Leighton, United States  
9 District Judge for the Western District of Washington, signed an Order authorizing the  
10 initial interception of wire and electronic communications over CARRILLO's current  
11 phone (TT62). Interceptions began on October 18, 2018, and ended on November 17,  
12 2018. Interceptions over TT62 helped agents identify, or begin to identify, additional  
13 members of the DTO in Western Washington and elsewhere.

14 90. On November 2, 2018, the Honorable Ronald B. Leighton, United States  
15 District Judge for the Western District of Washington, signed an Order authorizing the  
16 initial interception of wire and electronic communications over Juan Carlos AVILES  
17 Berrelleza's telephone (TT66). Interceptions over TT66 began on November 6, 2018,  
18 and ended on November 8, 2018, when AVILES stopped using the phone.

19 91. On November 14, 2018, the Honorable Ronald B. Leighton, United States  
20 District Judge for the Western District of Washington, signed an Order authorizing the  
21 initial interception of wire and electronic communications over Carlos Alejandro  
22 CASTRO Perez's phone (TT69) and Carlos LOPEZ's current phone (TT70), as well as  
23 the initial interception of wire communications over Gregory WERBER's phone (TT37).  
24 Interceptions began on that same day and, with respect to TT37 and TT69, are ongoing.  
25 Carlos LOPEZ stopped using his phone (TT70) on or about November 16, 2018, after  
26 Sillas advised him of the police search warrant that was executed on Cesar LOYA's  
27 residence on November 15, 2018.  
28

1           92. On November 19, 2018, the Honorable Ronald B. Leighton, United States  
2 District Judge for the Western District of Washington, signed an Order authorizing the  
3 initial interception of wire and electronic communications over Martin GONZALEZ's  
4 phone (TT63), and the initial interception of wire communications over Ramon  
5 PUENTES' phone (TT64). Interceptions over TT63 began on November 20, 2018, and  
6 ended on November 28, 2018, when law enforcement arrested GONZALEZ as he was on  
7 his way to deliver multiple kilograms of heroin to the CASTRO DTO. Interceptions over  
8 TT64 began on November 26, 2018, and are ongoing.

9           **VII. PROBABLE CAUSE FOR THE LOCATIONS TO BE SEARCHED**

10           93. During the instant investigation, agents have identified several locations  
11 and vehicles in Western Washington that are believed to be used in the facilitation of the  
12 CASTRO DTO's drug-trafficking activities. The following paragraphs are offered in  
13 support of my belief that probable cause exists to believe that these residences, including  
14 outbuildings and vehicles located within the curtilage of same (whether among the  
15 separately listed vehicles above or not), contain evidence, fruits and/or instrumentalities  
16 of drug trafficking and money laundering crimes committed by the CASTRO DTO in  
17 violation of Title 21, United States Code, Sections 841(a)(1), 843(b), 846, and 952, and  
18 Title 18, United States Code, Sections 1956 and 1957.

19           94. As stated above, the intercepted calls, surveillance observations, real-time  
20 tracking data, confidential source information, and enforcement activities described  
21 herein do not encompass all of the information agents have collected concerning the  
22 instant investigation. Rather, I have set forth only the facts that I believe are essential to  
23 establish the necessary foundation for the issuance of the requested search warrants. As  
24 such, I have included in this Affidavit several examples of drug-trafficking activity as  
25 they relate to each location. Some of these examples also encompass drug-trafficking  
26 activity as it relates to particular vehicles which investigators seek authorization to  
27 search. The examples below are only a representative sample of the evidence gathered  
28 during the entire investigation.

1           a) **Location 1.** Suspected drug and money stash location and prior residence  
 2           of Carlos Eduardo LOPEZ Hernandez: **a mobile trailer located at**  
 3           **22025 100th Ave. SE, Kent, Washington.**

4           95. This trailer has been Carlos Eduardo LOPEZ Hernandez's primary  
 5           residence throughout the majority of this investigation. At the time DEA and SOG began  
 6           working together on this investigation, LOPEZ was residing at this location, with  
 7           SARMIENTO. FRIAS replaced in December 2017, and then FRIAS lived with LOPEZ  
 8           at **22025 100th Ave. SE, Kent, Washington** for over a month. During the first quarter  
 9           of 2018, agents noticed LOPEZ moved to a condominium complex in Auburn,  
 10          Washington (this was the Emerald Pointe Condos where agents executed a delayed-  
 11          notice search warrant in August 2018). Shortly after LOPEZ moved out of the trailer at  
 12          **22025 100th Ave. SE, Kent, Washington**, agents noticed FRIAS also moved out.  
 13          FRIAS began living at **10545 SE 238th St., Unit 8, Kent, Washington**; every low-level  
 14          courier for the DTO (SARMIENTO, FRIAS, and HIGUERA) has lived at that apartment  
 15          (Unit 8) while they worked for the DTO in Washington since that time. ROCHA  
 16          replaced LOPEZ just after he (LOPEZ) had moved to the condominium in Auburn.

17          96. Even though LOPEZ and FRIAS moved out of the trailer at **22025 100th**  
 18          **Ave. SE, Kent, Washington**, agents still continued to see ROCHA visit the trailer from  
 19          time to time, from April to September 2018. Agents believe ROCHA was using the  
 20          trailer as an additional stash location for DTO money and drugs during that time. Agents  
 21          intercepted communications between ROCHA and Sillas that indicated the trailer was  
 22          still being used by the DTO in July 2018 (Sessions 73 and 76 over TT24). These sessions  
 23          were intercepted on July 13, 2018; Sillas and ROCHA were trying to determine a safe  
 24          place to unload and potentially store large amounts of heroin and pills. Sillas suggested  
 25          using the "little trailer" in each of these sessions, which agents believe was a reference to  
 26          the trailer at **22025 100th Ave. SE, Kent, Washington**.

27          97. On July 14, 2018, ROCHA detected police surveillance during a transaction  
 28          with Monique GREEN and immediately called Sillas to alert him. After hearing this,

1 Sillas instructed ROCHA to take a number of precautionary countermeasures during  
2 Session 273 on TT24. One of those countermeasures was for ROCHA to head directly to  
3 “the trailer” instead of going home. Based on tracking data for TV5 (ROCHA’s vehicle,  
4 a silver Toyota Corolla) agents know he did not completely listen to Sillas’ instructions—  
5 since he went back to his own residence in Auburn and then to AVILES’ residence.

6 98. ROCHA lived in the DTO condo in Auburn from March 2018, to August  
7 31, 2018—when agents executed their delayed-notice search warrant on the location and  
8 seized fentanyl pills, heroin, suspected crystal meth, marijuana, and over \$160,000 in  
9 cash from the residence. This confirmed agents’ suspicions about that residence being  
10 used as a stash location, and it furthered their belief that the trailer at **22025 100th Ave.**  
11 **SE, Kent, Washington** was previously used in that same manner, since that is where  
12 LOPEZ used to live. By the time of agents’ search warrant on the Auburn condominium,  
13 LOPEZ had returned to Western Washington and was living with ROCHA at that  
14 condominium. After this search warrant execution, ROCHA returned to Mexico and  
15 LOPEZ moved back into the trailer located at **22025 100th Ave. SE, Kent, Washington.**  
16 Agents believe the DTO maintained control of this trailer throughout the investigation—  
17 as a safe space for its members to reside and as a stash house for drugs and money—this  
18 is what allowed LOPEZ to move back into this trailer so quickly after the DTO’s condo  
19 in Auburn had been compromised. LOPEZ lived at the trailer from September to  
20 November 2018, at which point he moved to the **Pasa Fino II Apartments, 12212 SE**  
21 **310th St., AA303, Auburn, Washington.** LOPEZ’s use of the AA303 residence is  
22 discussed in Section VII (b) of this Affidavit.

23 99. From the start of the investigation, agents have observed LOPEZ,  
24 SARMIENTO and other members of the CASTRO DTO (including HEREDIA,  
25 ROCHA, FRIAS, and AVILES), through both physical and electronic surveillance,  
26 traveling to and from **22025 100th Ave. SE, Kent, Washington** before and after  
27 engaging in drug trafficking activities. Agents have logged the number of times these  
28 DTO members have traveled to **22025 100th Ave. SE, Kent, Washington.** Physical and



1 electronic surveillance data shows these DTO members made over 500 visits to **22025**  
2 **100th Ave. SE, Kent, Washington** throughout the course of this investigation.

3 100. For example, agents conducted several controlled purchase utilizing an  
4 Undercover Agent (UC). During the first purchase on November 16, 2017, the UC used  
5 a combination of communications over Facebook Messenger (with the Katherine Thomas  
6 account), TT1, and TT3 to complete the transaction. Agent saw SARMIENTO, via a  
7 mounted surveillance camera, leaving the **22025 100th Ave. SE, Kent, Washington**,  
8 residence prior to this purchase. Via a mounted surveillance camera, agents then saw  
9 SARMIENTO entering **Soltero's Market Mexican Store, 24202 104th Ave. SE, Unit**  
10 **104, Kent, Washington**, before conducting the purchase with the UC. SARMIENTO  
11 delivered about 49.5 grams (net weight) of a substance analyzed by the DEA Western  
12 Regional Laboratory (WRL) and found to be 30-34% pure heroin. Via GPS tracking,  
13 agents followed SARMIENTO back to **22025 100th Ave. SE, Kent, Washington**  
14 following the completion of the purchase via a GPS tracking device. This was one of the  
15 earliest instances where agents observed a courier for the CASTRO DTO utilizing this  
16 residence. Another, more recent, example of the DTO's use of this residence follows.

17 101. On October 9, 2018, at 2:20 p.m., agents intercepted an incoming call,  
18 Session 1365 on TT51 (LOPEZ), from the user of TT68, Cesar LOYA. During Session  
19 1365, Cesar LOYA asked if LOPEZ could supply him with at least 4,000, but preferably  
20 7,000, counterfeit oxycodone pills. Based on other intercepted communications over  
21 TT51, agents did not think LOPEZ actually had that many pills on hand at that time.  
22 During Session 1365, LOPEZ (TT51) told Cesar LOYA (TT68) that he (LOPEZ) was  
23 going to have a hard time getting even 4,000 pills, but would check and see how many he  
24 could get for Cesar LOYA and then call Cesar LOYA back. Cesar LOYA promised he  
25 would be able to pay cash up front for up to 7,000 pills if LOPEZ could get them.

26 102. This call ended and, twenty seconds later, agents intercepted an outgoing  
27 call (Session 1367 on TT51) from LOPEZ to Carlos CASTRO (TT69). Agents had  
28 previously identified Carlos CASTRO as the user of TT69 based on physical and



1 electronic surveillance. Agents have identified Carlos CASTRO as a high-volume  
2 distributor or potential distribution hub, similar to LOPEZ, based on intercepted  
3 communications over TT51 and physical/electronic surveillance. TT69 is subscribed to  
4 Carlos CASTRO at his apartment in Federal Way, and agents positively identified Carlos  
5 CASTRO based on his WADOL photograph.

6 103. On October 9, 2018, during Session 1367, LOPEZ (TT51) had asked Carlos  
7 CASTRO (TT69) if CASTRO had 4,000 pills because LOPEZ had a client who needed  
8 them ("the guy needs four ... buttons"). Carlos CASTRO said he had just gotten some  
9 pills in, so he would check. This call ended and agents intercepted several additional  
10 communications (Sessions 1368, 1369, 1372, and 1373) between LOPEZ (TT51) and  
11 Cesar LOYA (TT68), and LOPEZ (TT51) and Carlos CASTRO (TT69). These  
12 communications all pertained to the logistics of this multi-thousand pill transaction.  
13 Session 1369 was a text message from LOPEZ (TT51) to Carlos CASTRO (TT69),  
14 which read, "What's up do I start heading over or not yet?"

15 104. Following the text message in Session 1369, agents intercepted an  
16 incoming call on TT51 (LOPEZ) from Carlos CASTRO (TT69), at 2:39 p.m. During this  
17 call, I believe CASTRO told LOPEZ that the pills he had currently available were more  
18 expensive than the typical pills they had exchanged in the past. CASTRO clarified for  
19 LOPEZ by saying the pills he could get would be the "lighter blue ones." The two then  
20 discussed pricing. LOPEZ said he typically sold the pills for \$7.00 and made fifty cents  
21 per pill. LOPEZ told CASTRO if he (LOPEZ) were to raise his price even to \$7.50, his  
22 customers would go elsewhere. CASTRO then told LOPEZ that he was also getting the  
23 pills for \$7.00 each, so he (CASTRO) was not sure he could sell LOPEZ the pills at a  
24 cheaper rate, but said he (CASTRO) would check with his boss ("him") to see if the boss  
25 would drop the price. CASTRO went on to say if his boss dropped the price then  
26 CASTRO and LOPEZ could "do business" (referring to the previously discussed drug  
27 transaction).

1           105. About 45 minutes later, agents intercepted Session 1377 on TT51, at 3:24  
2 p.m. Session 1377 was an incoming call from TT69 (Carlos CASTRO) to LOPEZ during  
3 which Carlos CASTRO told LOPEZ that he could only supply 3,000 pills because the  
4 person he was getting the pills from wanted to keep 1,000 on hand for his own  
5 distribution ("It's going to be three milpas, dude ... It's going to be three thousand  
6 because, honestly, the guy doesn't want to stay dry; he wants to keep one milpa"). The  
7 word "milpa" literally translates to "cornfield," but agents and linguists know drug  
8 traffickers commonly use this word as a code word for "thousand" or "one thousand,"  
9 because the Spanish word "mil" (the first three letters of "milpa") literally translates to  
10 1,000.

11           106. At 4:02 p.m. on October 9, 2018, agents intercepted Session 1388 on TT51,  
12 an incoming call from Cesar LOYA (TT68). During this call, LOPEZ (TT51) told Cesar  
13 LOYA he would only be able to provide Cesar LOYA with 3,000 pills. Cesar LOYA  
14 agreed to buy that amount and the two men agreed to meet at the Everett Mall. From this  
15 call, agents believed LOPEZ would first meet with Carlos CASTRO to obtain the pills,  
16 then meet with Cesar LOYA to give the pills to Cesar LOYA and receive payment for the  
17 pills, and then meet with Carlos CASTRO again, to deliver the money LOPEZ owed for  
18 the pills.

19           107. At 4:26 p.m., agents intercepted another incoming call, Session 1398 on  
20 TT51, from Carlos CASTRO (TT69). During this call, LOPEZ (TT51) and Carlos  
21 CASTRO agreed to meet "in Shoreline, on 175th," where they had "met before." Agents  
22 believe the person who supplied Carlos CASTRO with the 3,000 pills lives in the Everett  
23 or Shoreline area since Carlos CASTRO referred to "here" multiple times during the call,  
24 indicating he was likely in the Shoreline or Everett area, as opposed to the area of his  
25 own residence in Federal Way. The content of the call also suggested Carlos CASTRO  
26 (TT69) had just received the 3,000 pills he intended to give to LOPEZ (TT51) and was  
27 pleased he did not have to drive all the way to Kent or Federal Way to deliver them to  
28 LOPEZ.

1           108. One minute after this call with Carlos CASTRO ended, at 4:28 p.m.,  
2 LOPEZ left the trailer at **22025 100th Ave. SE, Kent, Washington, in a red 2006 Ford**  
3 **Ranger bearing Washington license C04697M (TV4)**, and drove to Shoreline,  
4 Washington. During his drive to Shoreline, agents intercepted Session 1406, an  
5 incoming call from Carlos Castro (TT69) over TT51. In this call, LOPEZ (TT51) and  
6 Carlos CASTRO agreed to meet at the Goodwill in Shoreline. At 5:26 p.m., just as  
7 LOPEZ was exiting Interstate 5, he called Carlos CASTRO on TT69 (Session 1408).  
8 During this call, Carlos CASTRO changed their original meeting location from the  
9 Goodwill to a location on 8th Avenue Northeast, right on the side of the road. Two  
10 minutes later, agents intercepted another outgoing call on TT51 (Session 1410), in which  
11 LOPEZ and Carlos CASTRO specifically talked about meeting near 151st Street. Carlos  
12 CASTRO even warned LOPEZ during this call to be careful because there were many  
13 kids at the nearby park.

14           109. Two minutes after that call, agents on physical surveillance saw LOPEZ  
15 meet with Carlos CASTRO in a **green 2005 BMW X5 bearing Washington license**  
16 **BJM0956 (TV9)** at the intersection of 151st Street and 8th Avenue Northeast, in  
17 Shoreline. LOPEZ parked TV4 near TV9 and got in as the front passenger. After  
18 another two minutes, LOPEZ got out of TV9 and got back into TV4. Based on the  
19 content of the communications referenced above, agents believe LOPEZ received 3,000  
20 counterfeit oxycodone pills during this brief meeting on October 9, 2018, which took  
21 place inside TV9.

22           110. From there, LOPEZ contacted Cesar LOYA (TT68) and arranged to meet  
23 Cesar LOYA to deliver the pills LOPEZ had just received from Carlos CASTRO.  
24 During Session 1413 on TT51, LOPEZ and Cesar LOYA (TT68) agreed to meet at the  
25 Shell Gas Station located at 6602 220th Street Southwest in Mountlake Terrace,  
26 Washington. At 5:47 p.m., LOPEZ (TV4) arrived at that Shell station. Cesar LOYA  
27 arrived at the Shell gas station less than ten minutes after LOPEZ had arrived in TV4.  
28 Agents saw LOPEZ and Cesar LOYA meet at the gas pumps briefly. Agents believe

1 LOPEZ provided Cesar LOYA with the pills he had received from Carlos CASTRO  
2 during this brief meeting because both LOPEZ and Cesar LOYA left the Shell gas station  
3 immediately after.

4 111. Agents believe Cesar LOYA did not have the money to pay LOPEZ at that  
5 time, because LOPEZ did not start driving back toward his residence (or to Carlos  
6 CASTRO's) after this meeting at the Shell station. Instead, LOPEZ went to a nearby  
7 casino. LOPEZ remained at the casino until shortly after 7:00 p.m., when he received a  
8 call (Session 1414) from Cesar LOYA (TT68). During Session 1417, LOPEZ and Cesar  
9 LOYA referenced an address that Cesar LOYA had supposedly sent to LOPEZ. Agents  
10 believe Cesar LOYA sent the address to LOPEZ through some alternative  
11 communications means since agents did not intercept any text message or call over TT51  
12 with the address in it.

13 112. LOPEZ then left the casino in TV4, and tracking data showed the vehicle  
14 drove to Cesar LOYA's residence in Mountlake Terrace, Washington. TV4 arrived at  
15 this location at 7:30 p.m., and remained there for a few minutes before departing (based  
16 on tracking data associated with TV4). Agents believe LOPEZ received money from  
17 LOYA during this brief stop at LOYA's residence. Based on intercepted  
18 communications and tracking data, agents know LOPEZ then traveled to Federal Way,  
19 Washington to meet with CASTRO (and deliver the drug proceeds that were owed for his  
20 portion of the pills). After LOPEZ delivered the money to CASTRO in Federal Way,  
21 tracking data showed LOPEZ traveled back to Kent, Washington, stopped at an  
22 apartment complex, and then continued on to the DTO's trailer at **22025 100th Ave. SE,**  
23 **Kent, Washington.**

24 113. On November 2, 2018, agents used the real-time tracking of TV4 and the  
25 mounted surveillance camera at **22025 100th Ave. SE, Kent, Washington** to watch  
26 LOPEZ leave the trailer at 11:13 a.m., and travel (in TV4) to meet Oscar CARRILLO.  
27 Agents knew LOPEZ was traveling to meet CARRILLO based on intercepted  
28 communications over CARRILLO's phone, TT62. LOPEZ drove TV4 directly from the

1 trailer to CARRILLO's location in Seattle. Based on agents' knowledge of  
 2 CARRILLO's role in the DTO, they believe LOPEZ traveled to meet him on November  
 3 2, 2018, in order to deliver drug proceeds. Based on intercepted communications over  
 4 ROCHA and LOPEZ's phones, agents believe those two couriers have delivered over  
 5 \$300,000 of drug money to CARRILLO over the past few months. I believe this pattern  
 6 of travel (from **22025 100th Ave. SE, Kent, Washington**, directly to CARRILLO's  
 7 location) shows the DTO stores large amounts of drug proceeds at **22025 100th Ave. SE,**  
 8 **Kent, Washington**. This is why LOPEZ was—and has been on several other  
 9 occasions—able to leave directly from the trailer and deliver drug proceeds to  
 10 CARRILLO.

11 114. Over the course of the investigation, intercepted communications, mounted  
 12 surveillance camera footage, tracking data, and physical observations have all shown  
 13 multiple members of the DTO are using this residence for drug trafficking purposes.  
 14 Intercepted communications have indicated the DTO stores at least a portion of its drugs  
 15 and drug proceeds at this location. Agents have seen many members of the DTO come  
 16 and go from this residence, before and after suspected drug and money transactions.  
 17 Agents believe evidence of the CASTRO DTO's drug trafficking activities, such as drugs  
 18 and drug proceeds, will be located inside the trailer at **22025 100th Ave. SE, Kent,**  
 19 **Washington**.

20 b) **Location 2. Residence of Carlos Eduardo LOPEZ Hernandez: Pasa**  
 21 **Fino II Apartments, 12212 SE 310th St., AA303, Auburn,**  
 22 **Washington.**

23 115. Agents had initially identified Carlos LOPEZ as "Octavio Cota Lopez"  
 24 through physical/electronic surveillance, Facebook research, and telephone  
 25 tolls/subscriber records analysis. When agents first saw LOPEZ, he was living at the  
 26 same stash house in Kent, where SARMIENTO lived (the trailer at **22025 100th Ave.**  
 27 **SE, Kent, Washington**). Agents initially thought LOPEZ would be SARMIENTO's  
 28 replacement, but later determined that LOPEZ held a supervisory role in the DTO.

1 LOPEZ subsequently moved to an apartment in Auburn associated with Cindy  
2 SOLTERO through her credit report. During execution of a delayed-notice search  
3 warrant at that apartment (then the DTO stash house) on August 31, 2018, agents found a  
4 Mexican passport bearing Cota's photograph in the name Carlos Eduardo LOPEZ  
5 Hernandez; LOPEZ had returned to Western Washington that same weekend to resume  
6 his duties as a DTO distribution hub. LOPEZ has been the subject of two wiretap orders  
7 (using TT51 and TT70). Intercepted communications regarding LOPEZ's work for the  
8 DTO in Western Washington are described throughout this Affidavit.

9 116. On October 24, 2018, agents received court authorization to activate real-  
10 time tracking for LOPEZ's then-current cellular phone TT70. For several days in  
11 November 2018, tracking data for TT70 indicated LOPEZ was living in Auburn,  
12 Washington. Subsequently, agents set out on surveillance to identify LOPEZ's possible  
13 new residence. On November 8, 2018, agents observed TV4 (LOPEZ's known vehicle)  
14 parked out in front of the BB building of the **Pasa Fino II Apartments** located at **12212**  
15 **SE 310th St., Auburn, Washington**. On November 13, 2018, agents observed LOPEZ  
16 return to **Apartment AA303** at the **Pasa Fino II Apartments** in TV4. Subsequently  
17 agents continued to observe LOPEZ at the **Pasa Fino II Apartments, 12212 SE 310th**  
18 **St., AA303, Auburn, Washington**, during physical surveillance; agents believe he is  
19 currently living there.

20 117. On November 15 and November 16, 2018, agents conducted physical and  
21 electronic surveillance of LOPEZ. On both of those days, agents saw LOPEZ meet with  
22 CARRILLO for two separate money drops that occurred at the Southcenter Mall.

23 118. Agents intercepted a number of communications between LOPEZ and  
24 CARRILLO on November 15, 2018. Based on physical and electronic surveillance  
25 during that day, agents knew CARRILLO was with Gregory WERBER, in Western  
26 Washington, and the two were there to rent an apartment for CARRILLO in Tukwila,  
27 Washington. In the intercepted communications, LOPEZ and CARRILLO agreed to  
28 meet at the Southcenter Mall for LOPEZ to deliver drug proceeds to CARRILLO.

1 119. Prior to this money drop, agents had watched LOPEZ leave the **Pasa Fino**  
2 **II Apartments, 12212 SE 310th St., AA303, Auburn, Washington** and drive (in TV4)  
3 to meet with other members of the DTO, including SCOTT, URIAS, VALENZUELA,  
4 and a newly identified member of the DTO, known only at this time by his nickname:  
5 "WILSON." Based on previous intercepted communications over ROCHA and  
6 LOPEZ's phones, agents know the two distribution hubs (ROCHA and LOPEZ) would  
7 typically make such a trip to visit these other members of the DTO before meeting with  
8 CARRILLO in order to pick up large sums of cash from these other DTO members.  
9 Agents believe that is what LOPEZ did on November 15, 2018, prior to meeting with  
10 CARRILLO; specifically, I believe LOPEZ combined whatever cash he already had at  
11 the **Pasa Fino II Apartments, 12212 SE 310th St., AA303, Auburn, Washington** with  
12 the additional funds he received from other DTO members. LOPEZ drove right from his  
13 last meeting with one of the other DTO members to his meeting with CARRILLO.

14 120. While LOPEZ and CARRILLO were together at the mall, they walked out  
15 to LOPEZ's vehicle (TV4) in the parking lot and LOPEZ retrieved a small black bag  
16 from his TV4's back seat. LOPEZ gave that bag to CARRILLO and CARRILLO  
17 returned to the hotel where WERBER was located. Based on intercepted  
18 communications over TT70 agents believe LOPEZ delivered \$59,000 to CARRILLO  
19 during this meeting at the Southcenter Mall. LOPEZ drove back to the **Pasa Fino II**  
20 **Apartments, 12212 SE 310th St., AA303, Auburn, Washington** after this money drop.

21 121. On November 16, 2018, LOPEZ met with CARRILLO once again and the  
22 two conducted a very similar set of activities at the Southcenter mall. Tracking data and  
23 physical surveillance showed LOPEZ left from the **Pasa Fino II Apartments, 12212 SE**  
24 **310th St., AA303, Auburn, Washington** and drove to his meeting with CARRILLO at  
25 the mall. LOPEZ once again used TV4 to store and transport the cash and, based on  
26 intercepted communications over TT70, agents believe LOPEZ delivered \$96,000 to  
27 CARRILLO during this meeting.



1        122. After LOPEZ met with CARRILLO on November 16, 2018, agents  
2 intercepted an incoming call on TT70, Session 245, during which Jesus MORA called  
3 LOPEZ and told him that he (MORA) had to give LOPEZ some “pills” and “stuff.” At  
4 that time, agents did not have MORA identified, but they later identified him through  
5 physical surveillance. During Session 245 over TT70, MORA told LOPEZ that he could  
6 meet him on November 16 or the day after—whatever LOPEZ preferred. LOPEZ told  
7 MORA that he had not heard anything about this delivery, but he would check and see  
8 what “they” had to say.

9        123. Agents believed LOPEZ would likely call his manager, Sillas, and inquire  
10 about the legitimacy of this supposed delivery. Agents intercepted Session 249 over  
11 TT70 shortly thereafter, which was an incoming call from Sillas. During this call,  
12 LOPEZ told Sillas that he had just received a call. Sillas sounded excited and said he had  
13 forgotten to tell LOPEZ about the delivery. Sillas said this was supposed to be a delivery  
14 of pills (“buttons”)—just like MORA had said during Session 245—and one suspected  
15 kilogram of heroin (“churrito”). Sillas instructed LOPEZ to pay MORA \$2,500 for the  
16 transport.

17        124. After this call, agents intercepted an outgoing call over TT70, Session 250,  
18 from LOPEZ to MORA. During this call, LOPEZ told MORA that he had just received  
19 “confirmation” from Sillas regarding the delivery. MORA told LOPEZ that he was  
20 bringing LOPEZ “many bundles.” MORA also told LOPEZ that he was located “on 405,  
21 at Exit 7.” In this call, the two agreed to meet the following day because LOPEZ said  
22 Exit 7 on I-405 was far away from his location.

23        125. About ten minutes after this call, agents intercepted Session 254 over  
24 TT70—another call with MORA—during which LOPEZ told MORA that “they” told  
25 LOPEZ to take delivery on November 16 instead of the next day. MORA told LOPEZ  
26 that he was located at “the Denny’s” at Exit 7, and promised to send LOPEZ the address;  
27 agents never intercepted any message with MORA’s location, just as they never  
28 intercepted communications from Sillas (or any other DTO manager) that directed

1 LOPEZ to take delivery specifically on November 16, 2018. Agents believe LOPEZ may  
2 have used another means of communication to receive these messages.

3 126. At 7:07 p.m., tracking data for TV4 showed LOPEZ left the apartment  
4 complex he was at in Kent and drove directly to Exit 7 on I-405. This was 12 minutes  
5 after agents had intercepted Session 254 on TT70. Agents on physical surveillance were  
6 able to confirm LOPEZ's movements. Once TV4 took the exit, agents intercepted  
7 Session 255 on TT70 (an outgoing call to MORA). LOPEZ was unable to find the  
8 Denny's Restaurant MORA had mentioned in Session 254. MORA spent some time  
9 directing LOPEZ to his location, and eventually the two agreed to meet at a nearby  
10 Subway restaurant LOPEZ had managed to find. TV4's tracking data and physical  
11 surveillance confirmed LOPEZ's confusion.

12 127. Agents watched LOPEZ arrived at the Subway restaurant at 7:31 p.m.  
13 LOPEZ walked inside the restaurant. Three minutes later, agents saw MORA (in a white,  
14 hooded sweatshirt) walk up to TV4 and place a bag into the bed of TV4. MORA walked  
15 away from TV4 and then returned to the vehicle and retrieved the bag. After that, he  
16 brought the bag into the Subway restaurant. MORA spent a minute in Subway, with  
17 LOPEZ, and then he walked out of the restaurant and walked over to the nearby Denny's  
18 restaurant where he met with several other Hispanic males.

19 128. Agents later watched MORA access a white truck that was in a nearby  
20 motel parking lot. That vehicle was registered to him at an address in Arizona. Agents  
21 identified the room number MORA had accessed and later obtained rental records from  
22 the motel regarding the occupants of MORA's room. MORA was the registered  
23 occupant of the room, according to rental records, and had used a Mexican identification  
24 card to reserve the room. Agents positively identified MORA from that identification  
25 card.

26 129. LOPEZ left this delivery and conducted a brief counter-surveillance  
27 maneuver before returning to the **Pasa Fino II Apartments, 12212 SE 310th St.,**  
28 **AA303, Auburn, Washington.** Tracking data for TV4 showed LOPEZ arrived at the

1 **Pasa Fino II Apartments, 12212 SE 310th St., AA303, Auburn, Washington** at 8:18  
2 p.m. LOPEZ parked TV4 away from his actual apartment building and, a few minutes  
3 later, made an outgoing call to Sillas. Agents intercepted that call as Session 272 on  
4 TT70. During this call, LOPEZ told Sillas that he had received "big churros" and  
5 "eleven lines of buttons." Agents believe LOPEZ was referring to kilogram quantities of  
6 heroin when he said "big churros" and 11,000 pills when he said "eleven lines of  
7 buttons." Sillas reiterated that LOPEZ should change his phone number and then send  
8 his new number to Sillas. LOPEZ said he would turn TT70 off that night and Sillas said  
9 he would also change his phone number.

10 130. Session 272 was the last outgoing communication agents intercepted over  
11 TT70. Real-time tracking of TT70 showed the device was powered off immediately after  
12 Session 272 and has not been used since. From this call, agents believe LOPEZ  
13 unpackaged the drugs he had just received from MORA once he (LOPEZ) was inside the  
14 **Pasa Fino II Apartments, 12212 SE 310th St., AA303, Auburn, Washington**, and  
15 believe he is storing at least a portion of the DTO's drugs inside the **Pasa Fino II**  
16 **Apartments, 12212 SE 310th St., AA303, Auburn, Washington**.

17 131. Based on the length of time LOPEZ has been distributing drugs for the  
18 CASTRO DTO, the many times agents have observed LOPEZ conduct suspected drug  
19 transactions, the many times LOPEZ has delivered bulk cash (drug proceeds) to  
20 CARRILLO, the many times LOPEZ has met with suspected bulk drug transporters to  
21 deliver drug proceeds and/or retrieve bulk drug shipments, and the fact that the DTO has  
22 utilized LOPEZ's prior residences, **22025 100th Ave SE, Kent, Washington** and the  
23 condominium in Auburn, as a means to stash suspected drugs and drug proceeds, I  
24 believe evidence of LOPEZ's suspected drug trafficking activities and the proceeds  
25 thereof will be located at his current residence: the **Pasa Fino II Apartments, 12212 SE**  
26 **310th St., AA303, Auburn, Washington**.

27 132. Carlos LOPEZ has no known criminal history.  
28

1           c) **Location 3.** Business location for Cindy SOLTERO Jimenez: **Soltero's**  
 2           **Market Mexican Store, 24202 104th Ave. SE, Unit 104, Kent,**  
 3           **Washington.**

4           133. This location is referenced in bold throughout Section V and VII of this  
 5 Affidavit. This has been the location of Cindy SOLTERO's business during the course  
 6 of this investigation. LOPEZ, ROCHA, SARMIENTO, FRIAS, HIGUERA, HEREDIA,  
 7 and other suspected members of the CASTRO DTO have been seen traveling to and from  
 8 this location before and after engaging in drug trafficking activities. Based on intercepted  
 9 communications, physical and electronic surveillance observations, and agents'  
 10 interviews of other drug traffickers, I believe Cindy SOLTERO has used this business for  
 11 a number of years to launder—and more specifically conduct illegal transfers of —drug  
 12 proceeds from the US to Mexico.

13           134. Agents have observed couriers for the CASTRO DTO frequenting  
 14 **Soltero's Market Mexican Store, 24202 104th Ave. SE, Unit 104, Kent, Washington,**  
 15 immediately following suspected drug transactions. For example on January 25, 2018,  
 16 agents set up surveillance of Arturo FRIAS Ceballos, a previous courier for the CASTRO  
 17 DTO who agents believe is currently working for the DTO in another part of the United  
 18 States. At 6:42 p.m., agents observed FRIAS enter his red Volkswagen Jetta bearing  
 19 Washington license BFX7429 (Target Vehicle 1 or TV1) and leave **22025 100th Ave.**  
 20 **SE, Kent, Washington.** Agents maintained surveillance on TV1 as FRIAS drove to the  
 21 addresses of several local drug redistributors for the CASTRO DTO. At 7:15 p.m., TV1  
 22 stopped at Jerry Austin RODRIGUEZ Jaime's previous residence. FRIAS then drove  
 23 TV1 to Megan CHAPMAN's previous residence. Both CHAPMAN and RODRIGUEZ  
 24 were friends with the Katherine Thomas Facebook account, an account specifically used  
 25 by the CASTRO DTO for the purposes of conducting drug transactions. Both of these  
 26 stops lasted less than ten minutes, which I know from my training and experience is  
 27 consistent with short stay traffic associated with drug transactions.  
 28

135. Immediately following these two stops, agents followed TV1 back to **Soltero's Market Mexican Store, 24202 104th Ave. SE, Unit 104, Kent, Washington.** Once FRIAS arrived at **Soltero's Market Mexican Store**, he got out of TV1 and entered the market. Prior to this instance, agents had seen SARMIENTO conduct the exact same type of behavior. During more than one of the controlled purchases with CS1 and the UC, SARMIENTO came directly from **Soltero's Market Mexican Store** and went directly back to **Soltero's Market Mexican Store**. Juan HIGUERA has also frequented this establishment around the times of suspected drug transactions. I believe that couriers are frequenting **Soltero's Market Mexican Store, 24202 104th Ave. SE, Unit 104, Kent, Washington**, after drug transactions in order to drop off drug proceeds received from those transactions.

136. The activation of court-authorized interceptions of phones used by the CASTRO DTO has shown the DTO is using **Soltero's Market Mexican Store, 24202 104th Ave. SE, Unit 104, Kent, Washington**, as a money laundering location. For example on September 29, 2018, agents intercepted a call (Session 278 on TT51) between Jesus SARMIENTO over his cellular phone, 206-775-1053, and LOPEZ and SOLTERO, who were both using TT51. Session 278 was originally in Spanish and was transcribed by DEA-contracted linguists as detailed below:

- LOPEZ: What's up, relative?
- SARMIENTO: Are you on your way already?
- LOPEZ: I'm on my way over there. I just counted ...
- [VOICES OVERLAP]
- SARMIENTO: You're at the ...
- LOPEZ: ... some tickets because I was here at the store. Yeah.
- SARMIENTO: Listen, well, if you're at the store so you can bring me something.
- LOPEZ: I'm on the way. Or send me the ...

1 [VOICES OVERLAP]

- 2 • SARMIENTO: There ...
- 3 • LOPEZ: ... message.
- 4 • SARMIENTO: Are you at the store?
- 5 • LOPEZ: Yeah.
- 6 • SARMIENTO: Oh, look, ask Cindy for the cream. She already
- 7 knows. Is she there?
- 8 • LOPEZ: Yeah, she's here [U/I] ... [U/I] they're ...
- 9 • SOLTERO: [U/I].

10 [VOICES OVERLAP]

- 11 • SARMIENTO: Tell her to give you ... that ... that I need cream. I
- 12 don't know how you sell it, Cindy.
- 13 • SOLTERO: Mexica—the Mexican one, right?
- 14 • SARMIENTO: Yeah, the Mexican one. But what is it? It's a little
- 15 package of how many?
- 16 • SOLTERO: No, it's whatever ...

17 [VOICES OVERLAP]

- 18 • SARMIENTO: Small one ...
- 19 • SOLTERO: ... it's—I sell it to order, it's whatever you want.
- 20 • SARMIENTO: Oh. Bring me a—[STAMMERS] ... I don't know, it's
- 21 a liter bottle, half liter bottle, I would think so, right?
- 22 • SOLTERO: Okay. Uh-huh.
- 23 • SARMIENTO: Yeah, a liter one.
- 24 • SOLTERO: Alright then.
- 25 • SARMIENTO: Half to test it out. And send me a bag of shrimp, if
- 26 you have it.
- 27 • SOLTERO: Okay.
- 28

1 • SARMIENTO: Are you guys going to come tonight?  
2 • SOLTERO: Well, with what you said that shrimp we weren't  
3 planning on going but since you already said the magic word we are.  
4 • SARMIENTO: I'm ...  
5 [VOICES OVERLAP]  
6 • SOLTERO: [LAUGHS]  
7 • SARMIENTO: ... I'm telling you [LAUGHS] ... I'm telling you that  
8 my wife wants to make ... uh, these shrimp rolls?  
9 • SOLTERO: No, you didn't tell me, dude.  
10 • SARMIENTO: Read the message, don't be—read the messages, listen  
11 to it.  
12 • SOLTERO: Okay, I haven't seen it but I'll check it right now.  
13 • SARMIENTO: There you go. Now you are going to come—you  
14 didn't want to come? You'll see, I'm going to close the door on you.  
15 • SOLTERO: [LAUGHS]  
16 • SARMIENTO: [LAUGHS] Send me a bag of shrimp then and the, and  
17 the, and the lard ... the ...  
18 [VOICES OVERLAP]  
19 • SOLTERO: Alright.  
20 • SARMIENTO: ... cream. Cream, cream.  
21 • SOLTERO: Yeah, that's fine.  
22 • SARMIENTO: And bring me ... send me the ticket so I can pay you.  
23 • SOLTERO: Alright.  
24 • SARMIENTO: Alright then.  
25 • SOLTERO: Okay. Bye.  
26 [END OF CONVERSATION]  
27  
28



1        137. During this call, SARMIENTO asked LOPEZ if he was on his way to meet  
2 SARMIENTO. LOPEZ responded by telling SARMIENTO that he (LOPEZ) was on his  
3 way and that he "just counted some tickets because I was here at the store." Tracking  
4 data for TV4 and LOPEZ's phone indicated LOPEZ was at **Soltero's Market Mexican**  
5 **Store, 24202 104th Ave. SE, Unit 104, Kent, Washington**, at the time of this call.  
6 "Tickets" is a term commonly used by the CASTRO DTO to refer to cash drug proceeds.  
7 I believe that during this call, LOPEZ was counting cash drug proceeds at **Soltero's**  
8 **Market Mexican Store, 24202 104th Ave. SE, Unit 104, Kent, Washington**, because  
9 the DTO intended to use SOLTERO to send that money to other DTO members in  
10 Mexico through the wire remittance businesses she operates at the store. SOLTERO was  
11 in LOPEZ's presence during this call and could clearly hear his conversation with  
12 SARMIENTO, which included his use of the word "tickets" as a code word for money.

13        138. Agents intercepted several more conversations that involved mentions or  
14 references to Cindy SOLTERO. Many of these conversations were between ROCHA  
15 and Sillas, and LOPEZ and Sillas. During Session 2 over TT43 (ROCHA's phone),  
16 intercepted on August 29, 2018, Sillas directed ROCHA to collect drug money from  
17 several of the DTO's customers in Western Washington (including Monique GREEN).  
18 Sillas wanted ROCHA to "send" the money once he had collected it, and asked ROCHA  
19 to let him (Sillas) know once he "had the names." ROCHA told Sillas he (ROCHA) had  
20 already spoken with "Cindy." In this call, agents believe Sillas was asking ROCHA to  
21 pass him whatever names Cindy SOLTERO intended to use on her illegal wire transfers  
22 to people in Mexico, so those people in Mexico would be ready at the appropriate money  
23 remitting businesses, with the correct names of the transferees. Once ROCHA told Sillas  
24 that he had already spoken to SOLTERO ("Cindy"), Sillas sounded relieved.

25        139. From subsequent intercepted communications on that same day, agents  
26 determined there must have been an error with one of the transactions SOLTERO set up.  
27 In Session 53 on TT43, ROCHA told Sillas that "Cindy" had already "straightened out"  
28 the problem they had been experiencing. ROCHA told Sillas that the people in Mexico

1 would be able to cash out their transfers in two hours' time. From this series of  
2 transactions, agents believed the DTO was using SOLTERO and her money services  
3 business to transfer a portion of the DTO's drug proceeds that were earned in Western  
4 Washington to other DTO members in Mexico, and that on this particular occasion  
5 SOLTERO had made an error on one of the transfers, causing a slight problem for  
6 Sillas—one that ROCHA and SOLTERO resolved relatively quickly.

7 140. Another more recent example of SOLTERO's involvement in the CASTRO  
8 DTO's operations came from agents' interception of Session 1353 on TT51 (one of  
9 LOPEZ's phones). This was a 43-minute long call between LOPEZ and Sillas, during  
10 which Sillas and LOPEZ conducted a detailed accounting of the DTO's inventory of  
11 drugs and drug money that LOPEZ had handled, including drugs LOPEZ had received  
12 from bulk transporters, cash LOPEZ had paid those transporters, drugs LOPEZ had sold  
13 to clients, and cash LOPEZ had received from those clients. Part of this accounting had  
14 to do with what LOPEZ had done with the DTO's drug proceeds on various dates and  
15 times. This accounting indicated the quantities of drugs being delivered to various DTO  
16 members and the amounts of money these members had paid or owed. It also detailed  
17 the money LOPEZ had given to bulk transporters and money launderers like CARRILLO  
18 and SOLTERO.

19 141. With specific regard to SOLTERO and **Soltero's Market Mexican Store,**  
20 **24202 104th Ave. SE, Unit 104, Kent, Washington,** LOPEZ told Sillas that he had  
21 brought \$5,000 to "Cindy" at "the store" on Thursday, September 20, 2018; another  
22 \$5,000 "to the lady who owns the store" on Saturday, September 22, 2018; and \$10,000  
23 to the "lady who owns the store" on Saturday, September 29, 2018. Based on agents'  
24 knowledge of the DTO's use of Orlando BARAJAS' business in Burlington, Washington  
25 (detailed in Subsection (x) of this Affidavit), intercepted communications such as these,  
26 and the wealth of physical and electronic surveillance observations of DTO members at  
27 **Soltero's Market Mexican Store, 24202 104th Ave. SE, Unit 104, Kent, Washington,**  
28

1 agents believe SOLTERO is using her business in the exact same way BARAJAS is  
2 using his, to launder cash drug proceeds for the DTO.

3 142. Agents believe SOLTERO is taking these \$5,000 and \$10,000 deliveries of  
4 drug money and fraudulently transferring these funds to members of the CASTRO DTO  
5 in Mexico. Sillas, LOPEZ, ROCHA, and HEREDIA have often referred to "lists of  
6 names" when talking about money transfers for the DTO. Based on agents' knowledge  
7 of this particular organization (through intercepted communications and observations)  
8 and their post-arrest and proffer interviews of other drug traffickers in other  
9 investigations, agents believe SOLTERO is using fictitious names or a list of pre-  
10 recorded names she receives from the DTO to send money to drug traffickers in  
11 Mexico—for a fee. Agents believe SOLTERO uses these names to separate the  
12 CASTRO DTO's \$5,000 or \$10,000 transactions into five, ten, or twenty smaller  
13 transactions of \$1,000 or less, so as not to attract attention of regulators or law  
14 enforcement. This allows the DTO to essentially send drug money from the US to  
15 Mexico in less than one days' time, and SOLTERO takes a percentage of the money as  
16 her fee for conducting these illegal transfers.

17 143. Agents have observed, through physical and electronic surveillance,  
18 couriers for the CASTRO DTO stop at **Soltero's Market Mexican Store, 24202 104th**  
19 **Ave. SE, Unit 104, Kent, Washington**, over 500 times since the start of the  
20 investigation. During many of these stops, agents have observed couriers for the DTO  
21 enter **Soltero's Market Mexican Store, 24202 104th Ave. SE, Unit 104, Kent,**  
22 **Washington**, immediately following suspected drug transactions. Agents have also  
23 observed couriers for the DTO conduct drug transactions in the parking lot of **Soltero's**  
24 **Market Mexican Store, 24202 104th Ave. SE, Unit 104, Kent, Washington**, as  
25 described in Section V and Section VII (f) of this Affidavit. Based on the length of time  
26 **Soltero's Market Mexican Store, 24202 104th Ave. SE, Unit 104, Kent, Washington**,  
27 has been a suspected money laundering location for the CASTRO DTO, agents believe  
28 evidence of the DTO's money laundering activities and possibly drug proceeds will be

1 located inside **Soltero's Market Mexican Store, 24202 104th Ave. SE, Unit 104, Kent,**  
2 **Washington.** At the very least, agents believe SOLTERO's business records (or lack  
3 thereof for the DTO's transfers on specific dates) will demonstrate her use of her business  
4 to facilitate drug trafficking for the CASTRO DTO.

5 144. SOLTERO has no known criminal history.

6 d) **Location 4. Residence of Cindy SOLTERO Jimenez: 31600 126th Ave.**  
7 **SE, Space 106, Auburn, Washington.**

8 145. SOLTERO's involvement in the CASTRO DTO's illegal activities is  
9 discussed in Section VII (c) of this Affidavit. Throughout the course of this  
10 investigation, agents have observed SOLTERO driving to and from **31600 126th Ave.**  
11 **SE, Space 106, Auburn, Washington,** to and from **Soltero's Market Mexican Store,**  
12 **24202 104th Ave. SE, Unit 104, Kent, Washington.** In October 2018, agents observed  
13 Cindy SOLTERO's registered vehicle (a **2016 Nissan Frontier bearing Washington**  
14 **plate C30123H**) parked in Space 106 of the trailer park located at **31600 126th Ave. SE,**  
15 **Space 106, Auburn, Washington.** Based on physical and electronic surveillance, and  
16 intercepted calls, I believe **Soltero's Market Mexican Store, 24202 104th Ave. SE,**  
17 **Unit 104, Kent, Washington,** is a suspected money laundering business used by the  
18 CASTRO DTO and other DTOs in Western Washington. Several intercepted calls  
19 indicating SOLTERO's involvement in suspected money laundering and drug trafficking  
20 for the CASTRO DTO are referenced in the previous section of this Affidavit.

21 SOLTERO is the owner of **Soltero's Market Mexican Store,** and based on my training  
22 and experience it is common practice amongst money launderers to keep drug proceeds  
23 and/or records at their residences and businesses. I believe SOLTERO may be storing  
24 financial records and business documents at her residence (**31600 126th Ave. SE, Space**  
25 **106, Auburn, Washington**) as well as her business. I believe one of the only ways  
26 agents will have to prove SOLTERO is laundering money for the DTO is through careful  
27 review of these records. Agents believe these records and receipts, when coupled with  
28 surveillance footage, will show that many of the people SOLTERO claims to have

1 entered her business and conducted money transfers (money agents know belonged to the  
 2 CASTRO DTO) never actually set foot in the business. In this case, of equal importance  
 3 to the business records are any lack thereof for the DTO's transfers on specific dates. A  
 4 search of SOLTERO's residence will ensure agents have the complete universe of  
 5 SOLTERO's business records, wherever she may store them. Agents also believe  
 6 SOLTERO may be in possession of a portion of the DTO's drug proceeds, since she is  
 7 responsible for a portion of the DTO's money transfers to Mexico. Based on training and  
 8 experience, I believe a search of SOLTERO's residence, **31600 126th Ave. SE, Space**  
 9 **106, Auburn, Washington, and business, Soltero's Market Mexican Store, 24202**  
 10 **104th Ave. SE, Unit 104, Kent, Washington,** is the only way to secure evidence of  
 11 SOLTERO's involvement in this drug trafficking and money laundering conspiracy since  
 12 she likely stores at least a portion of her business records or cash at both her residence  
 13 and business.

14 e) **Location 5. Residence of Jesus Rene SARMIENTO Valenzuela: 10545**  
 15 **SE 238th St., Unit 8, Kent, Washington.**

16 146. This was Arturo FRIAS' primary residence, Juan Jose HIGUERA  
 17 Gonzalez's primary residence, and is currently Jesus SARMIENTO's primary residence.  
 18 SARMIENTO, FRIAS, and HIGUERA have all worked as low-level drug and money  
 19 couriers for the CASTRO DTO in Western Washington. Those couriers and other  
 20 members of the CASTRO DTO have been seen traveling to and from this residence  
 21 before and after engaging in drug trafficking activities on numerous occasions.

22 147. For example on June 28, 2018, between 6:41 p.m. and 6:43 p.m., agents  
 23 intercepted a series of text messages (Sessions 19 and 21 over TT19) between Alex  
 24 HUBLY (253-320-6619) and HIGUERA (TT19). During this text messaging exchange,  
 25 HUBLY asked HIGUERA, "Hey what time do you think you will be there?" to which  
 26 HIGUERA replied, "I'll be at your house in 45 mins." At 7:07 p.m., agents observed  
 27 TV3 (driven by HIGUERA at that time) leave from **10545 SE 238th St., Unit 8, Kent,**  
 28 **Washington.** At 7:30 p.m. and 7:31 p.m., agents intercepted an additional text

1 messaging exchange (Sessions 23 and 25) between HIGUERA and HUBLY. HUBLY  
2 asked HIGUERA how far away he was and HIGUERA said he was ten minutes away.  
3 At 7:42 p.m., agents observed TV3 arrive at 723 18th St. SW, Puyallup, Washington,  
4 HUBLY's residence at that time. TV3 (HIGUERA) was at 723 18th St SW, Puyallup,  
5 Washington for about one minute before leaving. Based on the Facebook records  
6 described above indicating HUBLY receives heroin from the CASTRO DTO, I believe  
7 HIGUERA's short-stay visit at HUBLY's then-residence was a drug transaction.

8 148. After HIGUERA's brief visit with HUBLY, agents observed TV3 begin to  
9 make several turns in the same direction and change its driving speed, indicating to  
10 agents HIGUERA was likely conducting counter surveillance in order to detect any  
11 police presence. Through my training and experience, I recognize this kind of behavior  
12 associated with someone who has recently conducted a drug delivery. I also know drug  
13 traffickers to behave in this manner prior to returning to their residence and/or stash  
14 house in order to prevent law enforcement from knowing where they store drugs.

15 149. This was just one instance where agents observed couriers for the CASTRO  
16 DTO traveling to and from **10545 SE 238th St., Unit 8, Kent, Washington**, prior to and  
17 following suspected drug transactions. In July 2018, agents watched ROCHA travel to  
18 this location in order to resupply HIGUERA with drugs (based on intercepted  
19 communications between ROCHA and HIGUERA). Agents physically watched ROCHA  
20 carry a plastic bag from his residence in Auburn, into his vehicle, and then drive to **10545**  
21 **SE 238th St., Unit 8, Kent, Washington**. Agents watched ROCHA (via physical and  
22 electronic means) get out of his car with that same bag and walk into **10545 SE 238th**  
23 **St., Unit 8, Kent, Washington**. ROCHA later emerged from **10545 SE 238th St., Unit**  
24 **8, Kent, Washington**, without the plastic bag. Based on the intercepted communication  
25 and surveillance observations, agents believe ROCHA very clearly delivered drugs to  
26 HIGUERA at **10545 SE 238th St., Unit 8, Kent, Washington**.

27 150. Real-time tracking data for the vehicles operated by CASTRO DTO  
28 couriers, like SARMIENTO, HIGUERA and FRIAS, indicates these couriers have



1 stopped at **10545 SE 238th St., Unit 8, Kent, Washington**, over 500 times since the start  
2 of the investigation. Based on Facebook records, physical and electronic surveillance,  
3 and intercepted communications, agents believe the low-level couriers for the DTO are  
4 storing a portion of the DTO's drugs and drug proceeds at this residence. This has  
5 allowed FRIAS, HIGUERA, and SARMIENTO to be quickly dispatched to drug  
6 deliveries by the CASTRO brothers. Agents intercepted wire and electronic  
7 communications over HIGUERA's phone during the summer of 2018, and saw him leave  
8 directly from this residence to go to drug transactions, and often times saw him return  
9 directly to this residence afterward. HIGUERA even conducted two drug transactions  
10 with the DEA UC in which he left from **10545 SE 238th St., Unit 8, Kent, Washington**,  
11 before the deal and returned to **10545 SE 238th St., Unit 8, Kent, Washington**,  
12 afterward. In more recent months, SARMIENTO replaced HIGUERA, but the travel and  
13 behavior pattern has remained the same.

14 151. Agents have seen SARMIENTO (through physical and electronic  
15 surveillance) leave **10545 SE 238th St., Unit 8, Kent, Washington**, and travel to  
16 suspected drug transactions with Martin GREGORY, Alex HUBLY, Jerry  
17 RODRIGUEZ, and others in Pierce County, Washington. Based on my training and  
18 experience, this long, consistent pattern of behavior—across three different couriers—  
19 clearly shows this residence is being used to store drugs and drug proceeds. Based on the  
20 length of time SARMIENTO and HIGUERA have been suspected of being couriers for  
21 the CASTRO DTO, agents believe evidence of SARMIENTO's drug trafficking  
22 activities and the proceeds thereof will be located inside SARMIENTO's home, **10545**  
23 **SE 238th St., Unit 8, Kent, Washington**.

24 152. SARMIENTO appears to have had a March 2018 encounter with CBP in  
25 Nogales, Arizona (disposition unknown), but has no other criminal history.

26 f) **Location 6.** Residence of Jaime HEREDIA Castro and Jose Luis  
27 **SIERRA Barrientos: 350 S Burlington Blvd., Burlington, Washington.**  
28



1        153. When agents first discovered HEREDIA's involvement in this  
2 investigation, he lived at the Olin Fields apartment complex in Everett, Washington.  
3 During the summer of 2018, agents intercepted a call between HEREDIA and ROCHA,  
4 during which HEREDIA explained how he thought he had discovered a tracking device  
5 on his vehicle at that time (a beige Ford pickup truck). HEREDIA told ROCHA that he  
6 had immediately abandoned that vehicle and his residence at the Olin Fields complex.  
7 Physical and electronic surveillance of HEREDIA confirmed this information.

8        154. Physical and electronic surveillance of HEREDIA after that call showed  
9 HEREDIA replaced his pickup truck with a **2002 red Honda Civic bearing Washington**  
10 **license BKS2788**. WADOL records listed this vehicle as being registered to "Jaime  
11 HEREDIA Castro" at "10115 Holly Drive, Apartment B106, Everett, Washington," the  
12 address to HEREDIA's previous residence at the Olin Fields apartment complex.

13        155. On July 13, 2018, at 6:08 p.m., agents intercepted an incoming call  
14 (Session 106 over TT24) from Sillas (TT28) to ROCHA (TT24). During this call, Sillas  
15 told ROCHA to give some instructions to HEREDIA. According to Sillas, HEREDIA  
16 was to travel down to ROCHA's area, at which point ROCHA was to provide HEREDIA  
17 with 500 pills. Immediately following this call, agents intercepted an outgoing call on  
18 TT24 (Session 107 over TT24) from ROCHA to HEREDIA (TT25). During this call,  
19 ROCHA conveyed Sillas' instructions to HEREDIA and HEREDIA agreed to travel to  
20 ROCHA's location in order to obtain 500 "buttons" (pills). HEREDIA asked ROCHA to  
21 count out "100," and ROCHA said he (ROCHA) could put "the five" into separate bags  
22 of 100—just as he had done in the past at HEREDIA's house. ROCHA then asked  
23 HEREDIA how long it would take HEREDIA to be to ROCHA's area and HEREDIA  
24 said he thought it would take about an hour and 20 minutes without traffic.

25        156. On July 13, 2018, at 6:56 p.m., agents intercepted an outgoing call (Session  
26 109 over TT24) to HIGUERA from ROCHA. ROCHA asked where HIGUERA was and  
27 told him, "It already arrived. A car and some buttons." HIGUERA acknowledged and  
28 said he was "at home." ROCHA then told HIGUERA he would come over soon. Shortly

1 after 7:00 p.m., agents used physical and electronic surveillance to watch ROCHA drive  
2 to and stop at **10545 SE 238th St., Unit 8, Kent, Washington**, (HIGUERA's "home,"  
3 now occupied by SARMIENTO). I believe the purpose of ROCHA traveling to the  
4 previously mentioned address was to resupply HEGUERA with a kilogram of heroin ("a  
5 car") and an unknown amount of counterfeit oxycodone pills ("buttons").

6 157. On July 13, 2018, at 8:05 p.m., agents intercepted an incoming call  
7 (Session 120 over TT24) from HEREDIA to ROCHA. During the call, ROCHA told  
8 HEREDIA he (ROCHA) was on his way home to drop off the money and pick up the  
9 "buttons." ROCHA asked HEREDIA if he (HEREDIA) was "there" (referring to a  
10 location the two had previously met at that was closer to ROCHA's house than  
11 HEREDIA's), and HEREDIA said he was "there" already. HEREDIA asked ROCHA  
12 how long it would take ROCHA to get to HEREDIA's location, just in case HEREDIA  
13 "needed to move." ROCHA said he would be able to meet with HEREDIA in twenty  
14 minutes, and HEREDIA agreed to wait at that location.

15 158. True to his word, ROCHA spent a brief amount of time at his apartment  
16 and then drove directly to **Soltero's Mexican Market Store, 24202 104th Ave. SE,**  
17 **Kent, Washington**. ROCHA arrived at about 8:30 p.m. Just before ROCHA arrived at  
18 the market parking lot, agents intercepted an outgoing call on TT24 (Session 127 over  
19 TT24) from ROCHA to HEREDIA. During this call, ROCHA asked HEREDIA where  
20 he was located in the parking lot. HEREDIA described the vehicle he was parked next to  
21 and ROCHA asked if HEREDIA was in the "red Honda." HEREDIA affirmed and  
22 ROCHA told HEREDIA he would park next to HEREDIA.

23 159. Special Agent DelVecchio used the mounted surveillance camera at  
24 **Soltero's Mexican Market Store, 24202 104th Ave. SE, Kent, Washington**, to watch  
25 TV5 drive through the parking lot. Initially, TV5 drove in the opposite direction of  
26 HEREDIA's **2002 red Honda Civic bearing Washington license BKS2788** but, after  
27 Session 127, ROCHA (TV5) changed positions in the parking lot and moved over to  
28 HEREDIA's **red Honda Civic bearing Washington license BKS2788**. Agent

1 DelVecchio watched as TV5 parked on the driver's side of the **red Honda Civic bearing**  
2 **Washington license BKS2788**. HEREDIA got out of the **red Honda Civic bearing**  
3 **Washington license BKS2788** and got into TV5 as the front passenger. After about one  
4 minute, HEREDIA got out of TV5 and got back into his own vehicle. The two vehicles  
5 left the parking lot in separate directions.

6 160. From these intercepted calls and surveillance observations, combined with  
7 my training, experience, and specific knowledge of the CASTRO DTO, I believe  
8 ROCHA traveled to **Soltero's Mexican Market Store, 24202 104th Ave. SE, Kent,**  
9 **Washington**, to meet with HEREDIA in order to give HEREDIA 500 pills—likely pills  
10 that are made to look like Oxycodone but are actually made with fentanyl. From this  
11 same combination of factors, I believe HEREDIA subsequently went and delivered those  
12 pills to customers or distributors of his who were waiting on a resupply. In fact, about an  
13 hour after this transaction, at 9:33 p.m., agents intercepted an incoming call (Session 148  
14 over TT24) from HEREDIA to ROCHA. During this call, HEREDIA asked ROCHA for  
15 “another 500,” indicating to agents that HEREDIA had very quickly distributed the 500  
16 pills ROCHA had given him at **Soltero's Mexican Market Store, 24202 104th Ave. SE,**  
17 **Kent, Washington**, and was asking for 500 more pills. I believe these intercepted calls  
18 clearly demonstrate HEREDIA's work as a drug trafficker and his use of the **red Honda**  
19 **Civic bearing Washington license BKS2788** to facilitate his drug trafficking activities.

20 161. Months later, on September 20, 2018, at 4:04 p.m., agents intercepted an  
21 incoming call (Session 365 over TT46) to HEREDIA. This call was from a man agents  
22 have identified only as “Guerito” based on the context of other intercepted  
23 communications. Guerito is a suspected manager/coordinator for the DTO, much like  
24 Sillas. During this call, Guerito arranged for HEREDIA to receive a load of drugs and  
25 for HEREDIA to pay the load driver who was transporting these drugs \$5,000 for his  
26 transportation services. Based on the coded language used in the call, agents believe “the  
27 guy” (the suspected load driver, whom agents identified as Martin GONZALEZ) was  
28 going to bring some “buttons” and “four of the chocolate ones” to HEREDIA. I believe

1 these terms are coded references to an unknown number of pills and four kilograms of  
2 heroin, based on my training and experience.

3 162. Following the call described above (Session 365), on September 20, 2018,  
4 at 5:28 p.m., agents intercepted an outgoing call (Session 370 over TT46) to 619-718-  
5 0533 (TT63). Agents later identified the user of TT63 as Martin GONZALEZ Jimenez.  
6 During this call, HEREDIA and GONZALEZ discussed the particulars about when and  
7 where the two would meet, ultimately deciding to meet at a place where the two had met  
8 in the past, which HEREDIA indicated was 45 minutes south of Mount Vernon,  
9 Washington. HEREDIA even told GONZALEZ "the guy said, he said it was five,"  
10 referring to the \$5,000 that Guerito had instructed HEREDIA to pay GONZALEZ for the  
11 delivery of suspected pills and heroin.

12 163. Through a law enforcement database, Special Agent Samuel Landis  
13 conducted a search of 619-718-0533 (TT63). After then contacting DEA agents in San  
14 Diego, Special Agent Landis learned GONZALEZ is employed as a truck driver and uses  
15 his tractor-trailer as a means to transport bulk quantities of suspected heroin to Western  
16 Washington, specifically, to the Tulalip, Washington area. DEA San Diego also sent  
17 agents pictures of GONZALEZ and his suspected vehicles (including a tractor-trailer),  
18 which were then disseminated to agents conducting surveillance. Due to the intercepted  
19 communications described above and the information provided by DEA San Diego,  
20 agents planned to conduct surveillance in the Snohomish County area in anticipation of  
21 HEREDIA and GONZALEZ's suspected drug-related meeting.

22 164. Agents then intercepted two additional calls over TT46 (Sessions 371 and  
23 376) between HEREDIA (TT46) and GONZALEZ (TT63). During these calls,  
24 GONZALEZ and HEREDIA made plans to meet at a truck stop north of Seattle. Based  
25 on HEREDIA's description of his location in Session 370, in conjunction with the  
26 communications during Session 371, agents believed HEREDIA and GONZALEZ would  
27 likely meet at a truck stop in the Snohomish County area. Agents familiar with Donna's  
28 Travel Plaza, the largest truck stop in Snohomish County, have had many past drug-

1 related investigations take place at this location. From this, agents then began conducting  
2 surveillance at Donna's Travel Plaza, Inc. (3104 116th Street NE, Tulalip, Washington)  
3 in hopes of observing the meeting between HEREDIA and GONZALEZ.

4 165. On September 20, 2018, at 9:05p.m., agents conducting surveillance  
5 observed HEREDIA arrive at Donna's Travel Plaza in his **red Honda Civic bearing**  
6 **Washington license BKS2788**. At 9:13 p.m., agents intercepted an incoming call  
7 (Session 391 over TT46) from GONZALEZ (TT63) to HEREDIA (TT46). HEREDIA  
8 told GONZALEZ he had arrived "at the store" and subsequently described his vehicle as  
9 the "red one." Minutes later, agents physically observed HEREDIA and GONZALEZ  
10 meet inside the **red Honda Civic bearing Washington license BKS2788**, during which  
11 GONZALEZ brought a large, weighted backpack to HEREDIA. At approximately 9:23  
12 p.m., agents watched GONZALEZ exit the red Honda, carrying the same red and black  
13 backpack; however, the bag seemed noticeably lighter when GONZALEZ exited  
14 HEREDIA's Honda. GONZALEZ then walked into the truck stop gas station/restaurant  
15 and HEREDIA left the parking lot in his **red Honda Civic bearing Washington license**  
16 **BKS2788**. After HEREDIA left the area, agents watched GONZALEZ get inside a  
17 tractor-trailer truck bearing Arizona license plate AH87591. Arizona DOL records list  
18 this vehicle as registered to GONZALEZ. Based on my training and experience, the  
19 intercepted communications described above, agents' observations and the meeting  
20 between GONZALEZ (TT63) and HEREDIA (TT46), I believe GONZALEZ delivered  
21 four kilograms of heroin and an unknown amount of counterfeit oxycodone pills to  
22 HEREDIA on behalf of Guerito, and used his tractor-trailer truck to do so. After  
23 HEREDIA took delivery of these suspected drugs, tracking data for TT46 showed  
24 HEREDIA drove directly back to his residence—**350 S Burlington Blvd., Burlington,**  
25 **Washington**.

26 166. HEREDIA still lives at this location based on agents' physical and  
27 electronic surveillance observations. During the course of this investigation, HEREDIA  
28 has made numerous drug deliveries directly from **350 S Burlington Blvd., Burlington,**

1 **Washington** to customers such as Michael and Karen SURYAN, and he has used his **red**  
 2 **Honda Civic bearing Washington license BKS2788** to do so. Agents believe  
 3 HEREDIA is likely storing drugs and drug proceeds at **350 S Burlington Blvd.,**  
 4 **Burlington, Washington**, based on intercepted communications over HEREDIA's  
 5 phones, physical and electronic surveillance, and their knowledge of HEREDIA's drug  
 6 trafficking activities.

7 167. HEREDIA appears to have a 2012 arrest out of Arizona for possession of  
 8 narcotics for sale (disposition unknown). SIERRA has no known criminal history.

9 g) **Location 7. Residence of Juan AVILES Berrelleza: the La Mirage**  
 10 **Apartments, 11247 SE 258th Pl., Apartment D306, Kent,**  
 11 **Washington.**

12 168. Based on physical observations and tracking data, I believe AVILES has  
 13 worked for the CASTRO DTO since at least mid-2018. ROCHA and AVILES met  
 14 regularly between June and August 2018, often times for relatively short durations, and  
 15 most often at AVILES' residence (**the La Mirage Apartments, 11247 SE 258th Pl.,**  
 16 **Apartment D306, Kent, Washington**). Additionally, based on physical surveillance  
 17 observations and tracking data, I know ROCHA and AVILES were both using a 2006 red  
 18 Ford Ranger (TV4) and a 2005 silver Toyota Corolla (TV5) during this period.

19 169. I believe AVILES was one of ROCHA's subordinates in the CASTRO  
 20 DTO for several reasons. TV4 was originally ROCHA's vehicle. In June, agents noticed  
 21 ROCHA was no longer parking TV4 in his assigned parking spot at the apartment  
 22 complex; instead, he began parking TV5 there. Around this same time, agents began  
 23 seeing ROCHA and AVILES interacting with each other more and more, mostly at **the**  
 24 **La Mirage Apartments, 11247 SE 258th Pl., Apartment D306, Kent, Washington.**  
 25 Initially, agents believed ROCHA had simply sold or traded TV4 to AVILES, but noticed  
 26 ROCHA still used TV4 occasionally, almost as if he retained authority over the vehicle.  
 27 ROCHA and AVILES continued to meet up almost daily, and I believe these meetings  
 28



1 were in furtherance of the CASTRO DTO's illegal enterprise, based on my training and  
2 experience

3 170. On July 3, 2018, tracking data showed TV5 traveled to TV4's location at  
4 **the La Mirage Apartments, 11247 SE 258th Pl., Apartment D306, Kent,**  
5 **Washington**, and remained there for about 25 minutes before TV5 traveled directly to  
6 **Soltero's Market Mexican Store**, a suspected money laundering business used by the  
7 CASTRO DTO and other DTOs in Western Washington. Based on this travel pattern,  
8 agents believe ROCHA received cash from AVILES that he (ROCHA) then took to  
9 **Soltero's Market Mexican Store** to transfer to his co-conspirators in Mexico.

10 171. On October 12, 2018, at 9:18 p.m., agents intercepted an outgoing call  
11 (Session 1826 over TT51) to AVILES (TT66) from LOPEZ (TT51). During this call,  
12 AVILES asked LOPEZ what he thought of the "churromino," and LOPEZ responded that  
13 he had given it to a few people and they said it was very good. AVILES asked if they  
14 had a lot, because he needed some samples for customers that buy "three, four, two, one."  
15 LOPEZ asked AVILES to clarify that he was talking ounces, and AVILES affirmed he  
16 was. LOPEZ said he usually got it for "8," and they agreed that AVILES would  
17 "sponsor" him (LOPEZ) with something after distributing the samples. The call ended  
18 after LOPEZ agreed to meet up with AVILES to provide the sample. Based on the coded  
19 language used in the call, agents believe "churromino" was heroin LOPEZ had received  
20 from an unidentified contact, and that AVILES wanted samples for his redistributors that  
21 normally buy between 1-4 ounces. AVILES said his redistributors get "three, four, two,  
22 one" respectively, which agents believe meant AVILES would need 10 total ounces of  
23 heroin. When LOPEZ told AVILES he usually got it for "8," agents believe LOPEZ was  
24 saying he could get 10 ounces of heroin for the price of eight. Agents believe LOPEZ  
25 was using the term "sponsor" as a way of asking how much money AVILES is going to  
26 give him (LOPEZ) for the deal.

27 172. Agents intercepted an additional incoming call on October 12, 2018, at 9:22  
28 p.m., over TT51 (Session 1827) between LOPEZ (TT51) and AVILES (TT66). During



1 this call, LOPEZ and AVILES discussed whether the “30’s” had arrived already. LOPEZ  
2 told AVILES they had not, and asked if he (AVILES) needed some. AVILES responded  
3 that he needed 1,000, which LOPEZ acknowledged. AVILES ended the call by telling  
4 LOPEZ they would talk soon. Based on the coded language used in the call, agents  
5 believe the “30’s” are referring to imitation oxycodone pills, and that AVILES wanted to  
6 get 1,000 pills from LOPEZ.

7 173. Real-time tracking data associated with vehicles driven by couriers for the  
8 DTO indicates that couriers have stopped at **the La Mirage Apartments, 11247 SE**  
9 **258th Pl., Apartment D306, Kent, Washington**, over 600 times during the course of the  
10 investigation. As with the other courier’s locations discussed thus far in this Affidavit, I  
11 believe AVILES is using **the La Mirage Apartments, 11247 SE 258th Pl., Apartment**  
12 **D306, Kent, Washington**, in a similar manner, i.e., to store drugs and drug proceeds.

13 174. Tracking data and physical surveillance shows AVILES does not have a  
14 storage unit or additional residence he consistently visits. He occasionally visits the  
15 DTO’s trailer in Kent (**22025 100th Ave. SE, Kent, Washington**), but not nearly often  
16 enough to be utilizing it as a stash location. His travel patterns to and from his residence  
17 are more consistent with all of the other couriers involved in this investigation. I believe  
18 AVILES is using his own residence, **the La Mirage Apartments, 11247 SE 258th Pl.,**  
19 **Apartment D306, Kent, Washington**, as a stash location, just like HIGUERA, FRIAS,  
20 SARMIENTO, ROCHA, and LOPEZ have used theirs. Tracking data for AVILES’  
21 vehicle has shown he makes frequent short-stay stops at residences and parking lots—just  
22 like HIGUERA, SARMIENTO, FRIAS, and other identified couriers for the DTO. After  
23 these stops, AVILES often returns directly to his residence (also just like these  
24 aforementioned couriers). Agents believe these short-stay stops are drug transactions  
25 based on their knowledge of AVILES’ position in the DTO, and their training and  
26 experience.

27 175. For instance, AVILES left **the La Mirage Apartments, 11247 SE 258th**  
28 **Pl., Apartment D306, Kent, Washington** in a beige 2001 Jeep Grand Cherokee

1 bearing Washington license BKG1931 (TV8) on November 7, 2018, and drove to a  
2 nearby parking lot in Kent, Washington. TV8 remained there for two minutes before  
3 departing. On that same day, AVILES drove TV8 to a residential neighborhood in  
4 Auburn, Washington, remained there for seven minutes, and then left; he returned to his  
5 residence after this short stop as well. After these trips, AVILES traveled from his  
6 residence to **Soltero's Market Mexican Store**—again, just like HIGUERA, FRIAS,  
7 SARMIENTO, and LOPEZ have done throughout this investigation. I believe AVILES  
8 took drug proceeds he had stored at his residence and delivered them to SOLTERO, at  
9 her business, for her to transfer to other members of the DTO in Mexico.

10 176. Later that same night (around 10:15 p.m.), AVILES left **the La Mirage**  
11 **Apartments, 11247 SE 258th Pl., Apartment D306, Kent, Washington** in TV8  
12 (according to tracking data) and drove all the way to a parking lot in Renton,  
13 Washington. AVILES remained in the parking lot for about fifteen minutes and then  
14 returned to **the La Mirage Apartments, 11247 SE 258th Pl., Apartment D306, Kent,**  
15 **Washington.** Again, this behavior is consistent with drug trafficking, based on my  
16 training and experience. I believe AVILES took a portion of the drugs he has stored at  
17 his residence and delivered to one of his customers at this particular parking lot. After  
18 the deal was completed, I believe AVILES took the proceeds from the transaction back to  
19 his residence.

20 177. Agents recently received a United States Postal Service mail cover  
21 response, which showed AVILES is receiving mail at this location. This did not come as  
22 a surprise to agents, since they have seen him at this residence throughout the majority of  
23 this investigation. What *was* surprising was the fact that the mail cover at **the La Mirage**  
24 **Apartments, 11247 SE 258th Pl., Apartment D306, Kent, Washington,** showed  
25 Daniel ROCHA is also receiving mail at this residence. Agents believe this shared  
26 address between ROCHA and AVILES shows the DTO is using the location for more  
27 than just housing purposes. They have trusted this location to receive mail in the true  
28 names of two members of the organization—and agents know ROCHA was responsible

1 for managing wholesale distribution quantities of heroin and fentanyl pills for the DTO.  
2 Agents believe AVILES is likely storing drugs and/or drug proceeds at **the La Mirage**  
3 **Apartments, 11247 SE 258th Pl., Apartment D306, Kent, Washington**, based on  
4 intercepted communications, physical and electronic surveillance, and their knowledge of  
5 AVILES' suspected drug trafficking activities.

6 178. AVILES has no known criminal history.

7 **h) Location 8. Residence of Hector Manuel URIAS Moreno: 428 105th St.**  
8 **SW, Everett Washington**

9 179. On August 30, 2018, agents intercepted an outgoing call (Session 74 over  
10 TT43) to Sillas from ROCHA (TT43). During that call, Sillas told ROCHA "Teto"  
11 wanted 6,000 pills. Immediately following Session 74, Sillas also provided ROCHA  
12 with "Teto's" cellular phone number, 360-429-9060 (TT48). Agents later identified  
13 "Teto" as Hector Manuel URIAS Moreno by comparing photographs taken of "Teto"  
14 during surveillance to URIAS' WADOL photograph. Based on intercepted  
15 communications over TT43, agents know ROCHA successfully delivered 6,000 pills to  
16 URIAS, and URIAS paid ROCHA \$34,850 in drug money later that same day.

17 180. On September 12, 2018, Special Agent DelVecchio received authorization  
18 from the Honorable David W. Christel, United States Magistrate Judge for the Western  
19 District of Washington, to activate real-time tracking of TT48. On September 24, 2018,  
20 Task Force Officer (TFO) Anthony Nisco and I followed tracking data for TT48 and  
21 simultaneously observed a **black 2007 Kia Rondo bearing Washington license**  
22 **BLE9305 (TV7)** at several locations near TT48. Subsequently, TFO Nisco and I  
23 identified URIAS as the user of TT48. TV7 came back registered to URIAS at **428**  
24 **105th St. SW, Everett Washington**. Physical surveillance further identified **428 105th**  
25 **St. SW, Everett Washington**, as URIAS' residence.

26 181. On September 24, 2018, United States District Court Judge Ronald B.  
27 Leighton (Western District of Washington) signed an Order authorizing the initial  
28 interception of wire and electronic communications for TT48. Agents subsequently

1 observed URIAS utilizing TV7 and TT48 to coordinate and execute drug transactions for  
2 the CASTRO DTO during the authorized period of interception.

3 182. For example, on September 28, 2018, at 8:06 p.m., agents intercepted an  
4 outgoing call (Session 531 over TT48) from URIAS to Carlos LOPEZ (TT51), which  
5 was right after LOPEZ had received a bulk drug resupply from a suspected bulk drug  
6 smuggler, Hector JACOBO Chairez. During Session 531, URIAS told LOPEZ, "I was  
7 told to give you a call to go over there, so you can give me something." URIAS went on  
8 to say he was instructed to, "make the arrangements and get some paste." LOPEZ  
9 sounded slightly confused upon hearing this, but once URIAS clarified by saying, "of the  
10 same ones that I get," LOPEZ seemed to understand. Agents believe URIAS was  
11 referring to counterfeit oxycodone pills during this conversation, based on Sillas' past  
12 comments to ROCHA (i.e., Session 74 over TT43, referenced above) and physical and  
13 electronic surveillance. URIAS and LOPEZ agreed to meet at a Wal-Mart in Renton,  
14 Washington.

15 183. Agents observed URIAS (TV7) arrive at the previously agreed-upon  
16 Renton Walmart. Agents then observed LOPEZ, through physical and electronic  
17 surveillance, drive TV4 to the same Walmart. After LOPEZ arrived, I observed him exit  
18 TV4 and walk over to TV7 (URIAS' vehicle), at which point he got into URIAS'  
19 passenger seat carrying a bag. Shortly after, I observed LOPEZ exit TV7 and return to  
20 TV4. Both TV4 and TV7 then left the Walmart. Agents maintained surveillance on  
21 TV7 utilizing physical and electronic means, as it returned to **428 105th St. SW, Everett**  
22 **Washington**. After receiving this suspected drug resupply from LOPEZ, URIAS went  
23 on to conduct suspected drug-related deliveries to some of his associates, including  
24 Andrew KRISTOVICH and Brian LIVELY, that very same night, based on intercepted  
25 communications over his phone (TT48) in conjunction with physical and electronic  
26 surveillance. Further details regarding these deliveries can be found in Sections VII (z)  
27 and (ww) of this Affidavit.

1 184. This was just one occasion where URIAS was observed driving TV7 to and  
2 from the **428 105th St. SW, Everett Washington**, residence. Real-time tracking data for  
3 TV7 indicates that URIAS has stopped at the **428 105th St. SW, Everett Washington**,  
4 residence many times throughout almost every day, since agents installed their court-  
5 authorized tracking device on TV7, on October 17, 2018. Agents believe URIAS is  
6 likely using **428 105th St. SW, Everett Washington**, in furtherance of his suspected  
7 drug trafficking activities based on intercepted communications, physical and electronic  
8 surveillance, and my training and experience.

9 185. URIAS has no known criminal history.

10 i) **Location 9.** Suspected stash location for Hector Manuel URIAS Moreno:  
11 **8503 8th Ave. W, Everett, Washington.**

12 186. Throughout September and October 2018, agents watched URIAS conduct  
13 numerous suspected drug transactions, many of which were supported by wire and  
14 electronic communications interceptions. Agents watched URIAS frequently travel  
15 between his primary residence, **428 105th St. SW, Everett Washington**, and **8503 8th**  
16 **Ave. W, Everett, Washington**. On many of these occasions, URIAS traveled to **8503**  
17 **8th Ave. W, Everett, Washington**, before and/or after suspected drug transactions with  
18 his distributors.

19 187. For example, on September 25, 2018, agents watched URIAS travel to  
20 **8503 8th Ave. W, Everett, Washington**, while he was in communication with Andrew  
21 Cain KRISTOVICH, one of URIAS' highest-volume pill distributors. Agents intercepted  
22 many calls and text messages between KRISTOVICH and URIAS that day (and several  
23 days afterward) regarding some pills URIAS had recently sold to KRISTOVICH that  
24 KRISTOVICH believed were of poor quality. KRISTOVICH was relentless in his  
25 attempts to get URIAS to take back his "bad mints" and replace them with good ones. At  
26 1:35 p.m. on September 25, 2018, agents intercepted an incoming call on TT48 (Session  
27 154), from URIAS' suspected manager in Mexico—someone in a similar position to  
28 Sillas. During this call, URIAS complained that KRISTOVICH was continually trying to

1 contact him about the bad product. URIAS' suspected manager told URIAS that he was  
2 working on a solution to this problem and thought more pills were on their way up to  
3 Washington. URIAS' suspected manager was aware of KRISTOVICH and referred to  
4 him as the "thousand guy," indicating to agents that KRISTOVICH likely bought pills  
5 from the DTO by the thousands. In the end, URIAS said he would "bring that back,"  
6 which agents believe meant he would take KRISTOVICH's return of the bad pills. Right  
7 before the call ended, URIAS told his suspected manager "I have to go pick up  
8 anyways." Agents believe this was a reference to having to pick up additional drug  
9 product from a stash location.

10 188. Once this call ended, agents used physical and electronic surveillance  
11 means to follow URIAS to **8503 8th Ave. W, Everett, Washington**. This residence  
12 looks practically abandoned. URIAS arrived there at about 1:57 p.m. and remained there  
13 until 2:10 p.m. From my training and experience, I know such short-duration trips to  
14 residences that do not appear to be lived in are indicative of drug activity. I believe  
15 URIAS visited **8503 8th Ave. W, Everett, Washington**, on September 25, 2018, in order  
16 to see if he had any different pills to give to KRISTOVICH in exchange for the poor  
17 quality ones KRISTOVICH wanted to return; hence, URIAS' reference to a "pick up"  
18 during the aforementioned conversation with his suspected manager in Mexico.

19 189. Again, during the course of their investigation into URIAS' activities,  
20 agents have seen him access **8503 8th Ave. W, Everett, Washington**, many times and  
21 remain there for short durations of time. Real-time tracking data for TV7 indicates that  
22 URIAS has stopped at **8503 8th Ave. W, Everett, Washington**, more frequently than he  
23 has at his own residence since at least October 17, 2018, when agents installed the  
24 tracking device on TV7. Agents believe URIAS resides at **428 105th St. SW, Everett**  
25 **Washington**, but uses the residence at **8503 8th Ave. W, Everett, Washington**, strictly  
26 as a stash location for his drugs and drug proceeds, based on the combination of  
27 intercepted communications over URIAS' phone with physical and electronic  
28 surveillance.



190. I believe this explains why TV7's tracking data shows more frequent stops at this location. URIAS stays at **428 105th St. SW, Everett Washington**, for longer periods and remains there overnight; thus, agents' tracking data shows fewer stops at this location. URIAS makes more frequent short-stay stops at **8503 8th Ave. W, Everett, Washington**, because he is not *living* at this residence. I believe he is only using **8503 8th Ave. W, Everett, Washington**, to store drugs and potentially drug proceeds; so he travels to this location (and stops here) more frequently because he visiting this site before and after drug deals, i.e., he is traveling here beforehand to obtain his drug product and afterward to deposit any cash or unused drug product he has. My training and experience has shown this is a common method drug traffickers use to secure their drugs and drug proceeds from being stolen by other drug traffickers or located by the police. Maintaining a standalone stash house and a primary residence separates the trafficker (such as URIAS) from his drug stash in the event that law enforcement executes a search warrant on only one of the locations. In one location, officers may find drugs, but no person to associate to those drugs; and in another, they may find the trafficker, but with no corresponding evidence of drug trafficking. I am seeking authorization to search both locations used by URIAS because I believe that is the only way to secure his drugs, drug proceeds, and other evidence of his drug trafficking crimes.

j) **Location 10. Residence of Jorge VALENZUELA Armenta: 4416 S 137th St., Tukwila, Washington.**

191. On October 1, 2018, at 11:37 a.m., agents intercepted an incoming text message (Session 368 over TT51) from Sillas (TT52) to LOPEZ (TT51). Sillas told LOPEZ, "5416565883 that's the one man." LOPEZ replied to Sillas (Session 370 over TT51) by saying "excuse me?", indicating to agents that LOPEZ was unaware of or possibly not understanding what Sillas was referring to in the text message. Then, at 11:42 a.m., agents intercepted an incoming call (Session 373 over TT51) from Sillas (TT52) to LOPEZ. During this call, agents believe Sillas instructed LOPEZ to contact an unknown male—later identified at Jorge VALENZUELA Armenta, as further described



1 below—who was using telephone number 541-656-5883 (TT61). Sillas told LOPEZ  
2 “Hey, would you be able to give ... uh, is this youngster the one that you gave two  
3 thousand buttons the other day?” to which LOPEZ acknowledged he had been familiar  
4 with the “youngster.” I believe this also indicated LOPEZ had met with this person (the  
5 youngster) in the past for a suspected drug transaction that included 2,000 “buttons,”  
6 which I know through my training and experience to be a coded reference to counterfeit  
7 oxycodone pills. Sillas then told LOPEZ, “And so you take him one thousand five  
8 hundred and he’s, and he’s going to give you some money.” I believe Sillas’ intention  
9 for having LOPEZ contact TT61 (VALENZUELA) was to have LOPEZ orchestrate a  
10 meeting with VALENZUELA (TT61) for a suspected drug transaction. Specifically, I  
11 believe LOPEZ was supposed to bring VALENZUELA 1,500 “buttons (or counterfeit  
12 oxycodone pills) to VALENZUELA in exchange for an unknown amount of money.

13 192. On October 1, 2018, at 11:44 a.m., agents intercepted an outgoing call  
14 (Session 374 over TT51) to VALENZUELA (TT61) from LOPEZ (TT51), in which  
15 LOPEZ and VALENZUELA agreed to meet. At about the same time, real-time tracking  
16 on LOPEZ’s red Ford Ranger (TV4) indicated LOPEZ was leaving his residence. Based  
17 on agents’ training and experience, and their knowledge of this investigation, agents  
18 believed the meeting between LOPEZ and VALENZUELA would likely occur at the  
19 Auburn Outlet Collection Mall.

20 193. In anticipation of the meeting between LOPEZ and VALENZUELA, agents  
21 began conducting surveillance at the mall, while also monitoring real-time tracking on  
22 TV4. At 12:30 p.m., agents intercepted an incoming call (Session 378 over TT51) from  
23 VALENZUELA (TT61) to LOPEZ (TT51). VALENZUELA told LOPEZ he was at the  
24 door. LOPEZ said he was nearby as well. Agents noticed real-time tracking on TV4 was  
25 located in the parking lot near the Burlington clothing store in Auburn, Washington.  
26 Agents subsequently located LOPEZ and VALENZUELA, and observed them meeting  
27 for what I believe to have been for the suspected 1,500 counterfeit oxycodone pill drug  
28 transaction. Following the meeting, agents observed VALENZUELA leave the area in a

1 **grey Volkswagen Jetta**; however, agents were unable to obtain the license plate  
2 information at that time.

3 194. On October 3, 2018, at 1:50 p.m., agents intercepted an incoming call  
4 (Session 693 over TT51) from VALENZUELA (TT61) to LOPEZ (TT51).  
5 VALENZUELA told LOPEZ he wanted to meet again, to which LOPEZ agreed, but told  
6 VALENZUELA, "later would be fine." At 2:30 p.m., LOPEZ (TT51) sent a text  
7 message (Session 694 over TT51) to VALENZUELA (TT61) that included an address of  
8 "25633 102nd Pl SE, Kent, WA 98030" (an address to the Azteca Mexican restaurant).  
9 Immediately following that text message, agents intercepted an outgoing call (Session  
10 969 over TT51) from LOPEZ (TT51) to VALENZUELA. LOPEZ told VALENZUELA  
11 he was free and indicated that he wanted to meet with VALENZUELA at the address he  
12 previously sent. VALENZUELA agreed.

13 195. At 2:35 p.m., agents intercepted an incoming call (Session 705 over TT51)  
14 from Sillas (TT52) to LOPEZ (TT51). LOPEZ told Sillas, "the button guy called," which  
15 I believe to a reference to VALENZUELA, and that he would be meeting him in order to  
16 collect a "ticket" for the "last 1,500." Based on my training and experience and my  
17 knowledge of this investigation, I believe LOPEZ told Sillas he was going to meet  
18 VALENZUELA in order to collect money—or a "ticket"—VALENZUELA owed from the  
19 previous suspected 1,500 pill drug transaction conducted at the Burlington clothing store.

20 196. At 3:01 p.m., agents intercepted an outgoing call (Session 711 over TT51)  
21 to VALENZUELA (TT61) from LOPEZ (TT51). LOPEZ told VALENZUELA he was  
22 on his way to meet him. VALENZUELA then told LOPEZ he was close by.

23 197. At 3:10 p.m., agents conducting surveillance observed a **grey Volkswagen**  
24 **Jetta bearing Oregon license plate 902KTS** enter the parking lot of the Azteca  
25 restaurant. Agents noticed the vehicle, and the driver of the vehicle, were the same  
26 person and vehicle they observed during the above-described meeting at the Burlington  
27 store on October 1, 2018. An Oregon DMV search listed the vehicle as being registered  
28 to Jorge VALENZUELA with an address of 515 SW 13th Pl, Apt H-3, Hermiston,

1 Oregon. From this, agents then obtained a picture of Jorge VALENZUELA from a law  
2 enforcement database. Agents subsequently compared surveillance photos with the photo  
3 obtained from the law enforcement database and determined VALENZUELA was indeed  
4 the person who met with LOPEZ on October 1, 2018, and was the person meeting  
5 LOPEZ on October 3, 2018.

6 198. Based on my training and experience, the intercepted communications  
7 described above and the meetings between LOPEZ and VALENZUELA, I believe  
8 LOPEZ delivered VALENZUELA 1,500 counterfeit oxycodone pills on October 1, 2018.  
9 Furthermore, I believe LOPEZ and VALENZUELA met again on October 3, 2018, so  
10 VALENZUELA could give LOPEZ suspected drug proceeds gathered from the  
11 previously mentioned 1,500 pills.

12 199. From these intercepted communications and surveillance observations,  
13 agents obtained court authorization to track VALENZUELA's phone (TT61). Tracking  
14 data for TT61 showed VALENZUELA routinely stayed overnight at **4416 S 137th St.,**  
15 **Tukwila, Washington.** Agents confirmed the **grey Volkswagen Jetta bearing Oregon**  
16 **license plate 902KTS** was regularly at this residence as well. Based on my training and  
17 experience, and general knowledge of normal human behavior, I believe VALENZUELA  
18 parked his vehicle at this location and his phone remained there overnight because **4416 S**  
19 **137th St., Tukwila, Washington** is VALENZUELA's residence.

20 200. On November 4, 2018, at 5:59 p.m., agents intercepted an outgoing call  
21 (Session 51 over TT62) from Oscar CARRILLO to a male, later identified as  
22 VALENZUELA, using 253-981-5568 (TT77). CARRILLO told VALENZUELA he was  
23 calling on behalf of the "electrician," and needed to pick up some "documents" (i.e., bulk  
24 cash/drug proceeds) from VALENZUELA. VALENZUELA asked where CARRILLO  
25 was, and CARRILLO said he was downtown. VALENZUELA said he was in Tukwila,  
26 and he would send CARRILLO an address. CARRILLO said he did not have a car.  
27 VALENZUELA said he would talk to his boss, but doubted anything could be done.  
28 Shortly thereafter, VALENZUELA sent a text to CARRILLO asking for his

1 (CARRILLO's) address. Immediately after that text, CARRILLO sent VALENZUELA  
2 (TT77) a text message that included an address of "1214 harrison street, 98109," the  
3 same address he sent Edgar CABRERA on October 21, 2018, so CABRERA could meet  
4 CARRILLO to give him (CARRILLO) suspected drug-proceeds.

5 201. At 6:05 p.m., agents intercepted an incoming text (Session 64 over TT62)  
6 from VALENZUELA (TT77) to CARRILLO that read, "I'm on my way." About 20  
7 minutes later, at 6:23 p.m., agents intercepted an incoming text (Session 71 over TT62)  
8 from VALENZUELA (TT77) to CARRILLO that read, "Gray Jetta." Then, at 6:24 p.m.,  
9 agents intercepted an incoming text (Session 75 over TT62) from VALENZUELA  
10 (TT77) to CARRILLO that read, "I'm arriving now." Based on my training and  
11 experience, I believe that CARRILLO received money from VALENZUELA (TT77) on  
12 November 4, 2018. I believe CARRILLO's use of the term "documents" was coded  
13 language referring to money. I also believe, when VALENZUELA provided his vehicle  
14 description as a "grey Jetta" he was referring to his **2005 grey Volkswagen Jetta**  
15 **bearing Oregon license 902KTS**. I believe VALENZUELA has used this vehicle to  
16 transport drugs and drug proceeds based on intercepted communications and surveillance  
17 observations.

18 202. On November 7, 2018, agents received authorization from the Honorable  
19 David W. Christel, United States Magistrate Judge for the Western District of  
20 Washington, to activate real-time tracking of TT77. Agents consistently observed  
21 tracking data for TT77 placing the device at **4416 S 137th St., Tukwila, Washington**.  
22 On November 15, 2018, agents intercepted several calls between LOPEZ (TT70) and  
23 VALENZUELA (TT77). During one of those calls (Session 41), LOPEZ asked  
24 VALENZUELA if he was going to return 3,000 pills and VALENZUELA stated that he  
25 would explain later. As a result, agents set out on surveillance of TT77 in order to  
26 observe this meeting. Agents were later able to confirm VALENZUELA as the user of  
27 TT77 when agents observed him (VALENZUELA) entering TV4 in order to conduct a  
28 meeting with LOPEZ in the same area tracking data placed TT77. Based on intercepted

1 communications involving LOPEZ, Sillas, and VALENZUELA, as well as my (and other  
2 agents') physical and electronic observations of LOPEZ and VALENZUELA's meetings,  
3 I believe VALENZUELA is a drug trafficker, more specifically, a high-volume pill  
4 redistributor. Based on physical and electronic surveillance, I believe VALENZUELA  
5 resides at **4416 S 137th St., Tukwila, Washington**, and likely stores drugs and drug  
6 proceeds at this location.

7 203. VALENZUELA appears to have been removed from the United States  
8 several times by Immigration and Customs Enforcement (ICE) in Phoenix, Arizona, in  
9 2004, by Customs and Border Protection (CBP) in Douglas Arizona, in 2005, and by  
10 CBP in McAllen, Texas, in 2014. He also appears to have a felony conviction in 2003  
11 for narcotic drug—possession for sale.

12 k) **Location 11. Residence of Michael John and Esther La Rena SCOTT:**  
13 **8024 150th St. SE, Snohomish, Washington.**

14 204. Agents first became aware that Michael John SCOTT and Esther La Rena  
15 SCOTT were members of the CASTRO DTO as the result of intercepted communications  
16 on August 30, 2018, between ROCHA, using TT43 and Esther SCOTT, using TT53.  
17 During that conversation, ROCHA and Esther SCOTT spoke in Spanish and agreed to  
18 meet at "the office," later identified as **Wired-in Networks, 18421 Highway 99, Suite B,**  
19 **Lynnwood, Washington**, in two hours. Agents believe Esther SCOTT acted as a  
20 translator between Michael SCOTT and ROCHA during this conversation. Later on  
21 August 30, during Session 74 over TT43, Sillas instructed ROCHA to bring 5,000 pills to  
22 SCOTT on that day ("take five if the guy from the office answers you"). On August 30,  
23 2018, agents watched ROCHA and LOPEZ meet with Michael SCOTT at **18421**  
24 **Highway 99, Suite B, Lynnwood, Washington**. ROCHA and LOPEZ drove TV5 to  
25 this meeting and Michael SCOTT drove his **black Honda Civic bearing Washington**  
26 **license BFZ2558**.

27 205. From additional intercepted communications between Sillas and ROCHA,  
28 and then SCOTT and ROCHA, agents believe SCOTT gave ROCHA \$150,000 in drug

1 proceeds on August 30, 2018, at **18421 Highway 99, Suite B, Lynnwood, Washington,**  
2 either as payment on a past drug debt or as payment for the 5,000 pills he had just  
3 received from ROCHA and LOPEZ. Specifically, after Sillas asked ROCHA to find out  
4 how much money SCOTT, "the office guy," had given him (during an intercepted call  
5 over TT43), ROCHA sent a text message to SCOTT that asked how much money  
6 SCOTT had given to him and LOPEZ (when they had met at SCOTT's business).  
7 Agents intercepted SCOTT's response, in Spanish, as Session 105 on TT43: "one  
8 hundred and fifty thousand dollars."

9       206. After that meeting, agents attempted to conduct physical surveillance of  
10 SCOTT in an effort to confirm his residence, and identify additional co-conspirators or  
11 other locations that might have been pertinent to the investigation. SCOTT conducted a  
12 number of counter surveillance maneuvers after he left the suspected transaction with  
13 ROCHA and LOPEZ. Agents attempted to maintain surveillance, but decided to  
14 discontinue their attempts after SCOTT made multiple suspicious driving maneuvers in  
15 his **black Honda sedan bearing Washington license BFZ2558**. Agents conducted  
16 physical surveillance of SCOTT's residence, **8024 150th St. SE, Snohomish,**  
17 **Washington**, on several other days in the months that followed and they saw SCOTT's  
18 **Honda Civic bearing Washington license BFZ2558** at the residence on those  
19 occasions. Though they did not see Michael SCOTT drive directly back to his residence  
20 after conducting the suspected drug transaction with ROCHA and LOPEZ on August 30,  
21 2018, agents did see Esther La Rena SCOTT conduct a drug transaction with LOPEZ in  
22 October 2018. On this occasion, agents *were* able to see the clear route of travel between  
23 the SCOTTs' business, **Wired-in Networks, 18421 Highway 99, Suite B, Lynnwood,**  
24 **Washington**, and their residence, **8024 150th St. SE, Snohomish, Washington.**

25       207. On October 5, 2018, I observed a meeting between Esther SCOTT and  
26 LOPEZ at **Wired-in Networks, 18421 Highway 99, Suite B, Lynnwood, Washington.**  
27 Esther SCOTT arrived driving a **silver 2013 Toyota Highlander bearing Washington**  
28 **license AQB8456**, registered to the **8024 150th St SE, Snohomish, Washington,**



1 residence. At around 12:15 p.m., Esther SCOTT entered **18421 Highway 99, Suite B,**  
2 **Lynnwood, Washington**, and turned the lights on. Moments later, LOPEZ arrived at  
3 **18421 Highway 99, Suite B, Lynnwood, Washington**, driving TV4. LOPEZ then  
4 exited TV4, carrying a black Armani Exchange bag, and entered **18421 Highway 99,**  
5 **Suite B, Lynnwood, Washington**. LOPEZ had driven directly from a suspected drug  
6 resupply with DTO transporter Ramon PUENTES (where agents saw PUENTES give  
7 LOPEZ a large black bag) to this meeting with Esther SCOTT.

8       208. At 12:28 p.m., while LOPEZ was inside the SCOTT's business, agents  
9 intercepted a conversation (over TT51) between LOPEZ and Sillas. During that call,  
10 Sillas instructed LOPEZ to give Esther SCOTT "everything," which agents believe was a  
11 reference to all of the drugs LOPEZ had just received from PUENTES. Based on the size  
12 of the bag LOPEZ carried into the business, this was a large amount of drugs. Sillas then  
13 asked LOPEZ how much money Esther SCOTT was giving to LOPEZ. LOPEZ asked  
14 Esther SCOTT and then told Sillas, "142,500." I believe LOPEZ gave Esther SCOTT all  
15 of the drugs, or possibly all of a certain type of drug, he had just received from  
16 PUENTES, and Esther SCOTT gave LOPEZ a large sum of cash. Originally, agents *and*  
17 LOPEZ believed Esther had given LOPEZ \$142,500. Based on subsequent (and almost  
18 frantic) interceptions over TT51 (LOPEZ's phone), agents believe Esther SCOTT only  
19 gave LOPEZ \$95,000 instead of \$142,000. This ended up causing quite a commotion  
20 among LOPEZ's managers in Mexico.

21       209. After LOPEZ delivered the drugs and received his cash from Esther  
22 SCOTT, LOPEZ exited **18421 Highway 99, Suite B, Lynnwood, Washington**. He was  
23 no longer carrying the black bag he had entered with. LOPEZ returned to TV4 and drove  
24 away. Shortly after LOPEZ left, Esther SCOTT exited **18421 Highway 99, Suite B,**  
25 **Lynnwood, Washington**, with a pink bag in her hands. She locked up the business and  
26 entered her **2013 silver Toyota Highlander** bearing Washington license **AQB8456**,  
27 and departed **18421 Highway 99, Suite B, Lynnwood, Washington**.  
28



210. Agents maintained surveillance on Esther SCOTT and observed her return to her and Michael SCOTT's residence at **8024 150th St. SE, Snohomish, Washington**, after a brief stop at a nearby grocery store. Based on intercepted communications, tracking data, and physical observations, I believe LOPEZ received a large resupply of drugs from Ramon PUENTES and then brought those drugs to Esther SCOTT at **18421 Highway 99, Suite B, Lynnwood, Washington**. There, I believe LOPEZ and Esther SCOTT exchanged drugs and money (though Esther SCOTT did not provide LOPEZ with the correct amount of money). Once that exchange was made, I believe Esther SCOTT took the drugs she had received from LOPEZ back to **8024 150th St. SE, Snohomish, Washington**, using the **2013 silver Toyota Highlander** bearing **Washington license AQB8456**. Tracking data for TV3 and TV4 showed both vehicles traveled to **8024 150th St. SE, Snohomish, Washington** (the SCOTT residence) later that day, at the same time. I believe LOPEZ (TV4) and SARMIENTO (TV3) traveled to this location, in tandem, as a way for SARMIENTO to provide security for LOPEZ—since Esther SCOTT had essentially received all of the drugs but had not paid for them. I believe this series of events clearly demonstrates Michael and Esther SCOTT's use of their business (**Wired In Networks, 18421 Highway 99, Suite B, Lynnwood, Washington**) and residence (**8024 150th St. SE, Snohomish, Washington**) to facilitate drug trafficking.

211. Michael SCOTT's criminal history consists of a 2014 VUCSA conviction for manufacture/deliver cocaine (12 months + 1 day prison term). Esther SCOTT has no known criminal history.

**I) Location 12. Business of Michael and Esther SCOTT: Wired in Networks, 18421 Highway 99, Suite B, Lynnwood, Washington.**

212. The SCOTT's use of **Wired in Networks, 18421 Highway 99, Suite B, Lynnwood, Washington**, for drug trafficking purposes is discussed above in Subsection (k). It is the known business location of Michael and Esther SCOTT; Esther SCOTT is the registered owner. I believe this business is merely a "front" for criminal activity, i.e.,

a business that is purposely made to look like it is operating when it actually is not, or a business operating in a certain, typically legal, manner in appearance only, but is truly being used to facilitate or outright commit crimes. Agents have conducted physical surveillance at **Wired in Networks, 18421 Highway 99, Suite B, Lynnwood, Washington**, on multiple occasions and they have never seen the business open other than when members of the CASTRO DTO (such as ROCHA or LOPEZ) travel to the business. During these visits from ROCHA and LOPEZ, agents have seen Michael and Esther SCOTT first open, then close and lock up the business premises after their suspected drug transactions with ROCHA and LOPEZ have been completed. In addition to the two instances described above in Subsection (k), agents have observed ROCHA and LOPEZ, through physical and electronic surveillance, make short-stay visits to **Wired in Networks, 18421 Highway 99, Suite B, Lynnwood, Washington**, 13 additional times. I believe, based on my knowledge of this investigation and the two instances described in Subsection (k), that **Wired in Networks, 18421 Highway 99, Suite B, Lynnwood, Washington**, is being used for drug trafficking and money laundering (i.e., storing bulk cash drug proceeds), and that evidence of the same will be found inside.

m) **Location 13. Residence of Gerald Keith RIGGINS: 5824 152nd St. E, Puyallup, Washington.**

213. On July 2, 2018, at 8:20 p.m., agents intercepted an outgoing call (Session 163 over TT19) from HIGUERA (TT19) to ROCHA (TT24). ROCHA said he was going to see "the guy" (later identified as RIGGINS) right now, at the meeting location, at 8:40 p.m. At approximately 8:30 p.m., agents, via electronic surveillance, were able to observe ROCHA travel to and stop near a Chevron gas station (1402 Outlet Collection Way in Auburn). At 8:39 p.m., agents then intercepted an incoming call (Session 164 over TT19) from ROCHA (TT24) to HIGUERA (TT19). During Session 164, ROCHA told HIGUERA he had already met with "the guy" (RIGGINS).

1           214. On July 5, 2018, Special Agent Anthony DelVecchio obtained surveillance  
2 footage from the Chevron at 1402 Outlet Collection Way from the night of July 2, 2018.  
3 On the surveillance footage, at 8:32 p.m., agents saw a black Cadillac XTS bearing WA  
4 license BHC6348 (registered to Gerald RIGGINS at **5824 152nd St. E, Puyallup,**  
5 **Washington**) arrive at the gas station store entrance. At 8:33 p.m. (on the surveillance  
6 footage), agents observed a black male get out of the Cadillac on the front passenger's  
7 side and walk into the store where he bought several items. The Cadillac then moved to  
8 another location in the parking lot, away from the front door of the store. At 8:34 p.m.  
9 (on the surveillance footage), a bald black male got out of the driver's seat of the Cadillac  
10 and opened the trunk. Agents believe was Gerald RIGGINS, based on a comparison with  
11 his WADOL photo. Surveillance cameras then captured RIGGINS as he opened a box in  
12 his trunk and emptied it out, then placed a different package/item into the box he had just  
13 emptied.

14           215. Agents suspect the package RIGGINS placed in the box was money  
15 ("tickets") for ROCHA, as ROCHA and HIGUERA discussed in Session 164. At 8:35  
16 p.m. (on the surveillance footage), RIGGINS shut the trunk of the Cadillac and returned  
17 to the driver's seat with the newly stuffed box in hand. At 8:37 p.m. (on the surveillance  
18 footage), TV5 (ROCHA) appears at the Chevron station. Agents matched the real-time  
19 tracking of TV5 with the Chevron surveillance footage, and confirmed the vehicle's  
20 arrival. TV5 then parked just outside of the gas station boundaries. Almost immediately  
21 upon TV5's arrival, the Cadillac drove out of the parking lot and over to TV5's location.  
22 At 8:38 p.m. (on the surveillance footage), the Cadillac parked at a nearby, adjacent  
23 parking lot to the Chevron and TV5 parked next to it. Someone from the Cadillac  
24 (believed to be RIGGINS) got into the passenger side of TV5 and then quickly got out.  
25 At 8:39 p.m., the Chevron surveillance footage showed TV5 and the Cadillac leaving the  
26 area in tandem, which was the same time ROCHA called HIGUERA (Session 164 over  
27 TT19) and told him he had just met "the guy," indicating RIGGINS was likely "the guy."  
28

1        216. On July 11, 2018, agents intercepted several text messages between  
2 ROCHA (TT24) and RIGGINS, using number 253-999-7313 (TT38). During those  
3 messages, ROCHA and RIGGINS talked about meeting at a Chevron in Auburn,  
4 Washington. Agents believed this proposed meeting was to conduct a drug transaction,  
5 based on the previous meeting of RIGGINS and ROCHA at the very same gas station.

6        217. At 1:26 p.m., on July 11, 2018, agents observed ROCHA, via physical and  
7 electronic surveillance, arrive at the Chevron in TV5. Simultaneously, agents watched  
8 RIGGINS pull into the same parking lot while driving a **Harley Davidson motorcycle**  
9 **bearing Washington License 3E8988**, registered to RIGGINS. About a minute later,  
10 agents observed TV5 leave the Chevron. The meeting was so brief that agents do not  
11 believe RIGGINS actually got into TV5. They believe RIGGINS and ROCHA  
12 conducted the transaction while RIGGINS stood at the window of TV5. RIGGINS left  
13 the area on his **Harley Davidson motorcycle bearing Washington License 3E8988**;  
14 due to traffic restrictions at that time, agents were unable to follow RIGGINS after he left  
15 the gas station.

16        218. About an hour later, ROCHA called Sillas and said "the guy" (RIGGINS)  
17 was supposed to give him \$7,000 but only gave him \$6,750. ROCHA (at Sillas'  
18 direction) texted RIGGINS about the shortage, and RIGGINS replied, "Okay I will give  
19 you that over on the next one up on top of the 27." I believe this pricing structure (adding  
20 the \$430 to the \$27,000 RIGGINS already owed) is consistent with a heroin transaction.  
21 I further believe RIGGINS paid \$7,000 to ROCHA on July 11, 2018, and still owed  
22 ROCHA \$27,000, for a total of \$34,000, consistent with a debt for a kilogram of heroin.

23        219. On August 30, 2018, Special Agent DelVecchio received authorization  
24 from the Honorable David W. Christel, United States Magistrate Judge for the Western  
25 District of Washington, to activate real-time tracking of TT38 (RIGGINS). In September  
26 2018, agents confirmed RIGGINS was the user of TT38 by following TT38's movements  
27 and confirming RIGGINS' movements matched those of TT38. Several vehicles  
28 registered to RIGGINS, including **the Harley Davidson motorcycle bearing**

1 **Washington License 3E8988** observed on July 11, 2018, have **5824 152nd St. E,**  
2 **Puyallup, Washington,** listed as their registered address. Tracking data for TT38  
3 indicated RIGGINS remained overnight at **5824 152nd St. E, Puyallup, Washington,**  
4 almost every evening during the authorized period of tracking.

5 220. The residence located at **5824 152nd St. E, Puyallup, Washington,** is  
6 ideal for a drug trafficker. A large mechanical gate provides access control at the  
7 driveway of the dwelling. The home is set far back from the road and is blocked from  
8 public view by trees and other foliage. There are also several signs posted at the  
9 residence that warn possible trespassers about the various surveillance cameras on the  
10 property. Agents have also observed a silver Cadillac DTS with no rear license plate at  
11 this property. Agents believe this vehicle was the same one they observed on September  
12 30, 2018, during a suspected drug transaction between RIGGINS and LOPEZ.

13 221. On that date, RIGGINS drove a 2008 silver Cadillac DTS with no license  
14 plates to a meeting with LOPEZ. Agents positively identified RIGGINS as the driver of  
15 the vehicle on that date. Surveillance units observed RIGGINS drive to the vicinity of  
16 the Panda Express and park. LOPEZ, in **TV4**, was parked nearby. Agents were unable  
17 to view the meet between LOPEZ and RIGGINS due to traffic, but observed both  
18 vehicles depart the area shortly after. At 4:06 p.m., agents intercepted a call (Session 344  
19 over TT51) that talked about RIGGINS paying LOPEZ \$24,935. Agents believe  
20 RIGGINS met with LOPEZ to deliver \$24,935 to pay off a drug debt.

21 222. Agents' review of Washington DOL records showed RIGGINS registered a  
22 2008 silver Cadillac DTS at the very end of August 2018, and eventually received the  
23 license plate BMD8360 for the vehicle. From my training and experience, I believe this  
24 was the same vehicle agents saw at RIGGINS' registered address, **5824 152nd St. E,**  
25 **Puyallup, Washington,** and I believe he has used his **Harley Davidson motorcycle**  
26 **bearing Washington License 3E8988** and various Cadillac sedans (among other  
27 vehicles) to conduct drug transactions. I believe he uses his residence to store at least a  
28 portion of his drugs and drug proceeds, since it is a secure location.

223. RIGGINS' criminal history consists of a 2013 conviction in this District for Distribution of Heroin and Felon in Possession (CR12-207 MJP) with a 35-month (less two days) prison term; a felony drug trafficking conviction in 1999 (34 months prison); two gross misdemeanor convictions for assault 4 (1996 & 1994) resulting in two no contact order violations (2000 & 1997), and multiple DWLS convictions (to include one as an "habitual traffic offender"). He was arrested in 2012 in Oregon for delivery and possession of cocaine (both dismissed), and has a 1991 probation disposition in California for carrying a firearm in a vehicle.

n) **Location 14.** Residence of Julian Gauge ORDONEZ: **34402 28th Pl. SW, Federal Way, Washington,** and

o) **Location 15.** Residence of Julian Gauge ORDONEZ: **34235 18th Pl. S, Federal Way, Washington.**

224. After ROCHA received a resupply of drugs on July 13, 2018, he began to distribute those drugs to other members of the DTO in Western Washington, at Sillas' direction. At 7:07 p.m., agents intercepted an outgoing call (Session 112 over TT24) to Sillas (TT28) from ROCHA (TT24). During this call, Sillas and ROCHA sorted out logistics for their suspected pill distribution, after ROCHA had just received LOPEZ's suspected bulk drug delivery. ROCHA informed Sillas he had recently spoken with Manuel LOYA and told Sillas he (ROCHA) did not have enough pills to accommodate Manuel LOYA's requested pill resupply. Sillas then told ROCHA they would find a separate drug source of supply to provide pills for LOYA. However, Sillas then told ROCHA "but, in the meantime, go see 'Cuate' (HIGUERA), 'Carteras' (HEREDIA), and the other guy, the one of the 200 pills," to which ROCHA replied, "... I'll go to Carteras, and from Carteras, I'll go to 'Guero's.'"

225. After agents on surveillance observed ROCHA make both of his suspected pill deliveries to HIGUERA and HEREDIA, at 8:15 p.m., agents intercepted the following outgoing call (Session 126 over TT24) from ROCHA (TT24) to Julian Gauge ORDONEZ (TT40). At the time of that call, agents did not have ORDONEZ positively



1 identified. They later were able to identify ORDONEZ based on the subsequent events  
2 of July 13, 2018, and information obtained by the DEA UC in this investigation. In  
3 Session 126, ROCHA told ORDONEZ, "Right now, I'm taking you the blues ... 200."  
4 From this, agents believe ORDONEZ was "the other guy, the one of the 200 pills" Sillas  
5 referred to in his conversation with ROCHA (Session 112), as described above. I believe  
6 ROCHA (who in turn referred to "the other guy, the one of the 200 pills" as "Guero")  
7 was telling ORDONEZ he was going to bring ORDONEZ 200 counterfeit oxycodone  
8 pills made with fentanyl when he said, "... I'm taking you the blues ... 200." From my  
9 training, experience, and knowledge of this investigation (and others) I know imitation or  
10 legitimate oxycodone pills can be blue in color and are often referred to as "blues."

11 226. At 8:57 p.m., agents on surveillance followed ROCHA to **34402 28th Pl.**  
12 **SW, Federal Way, Washington.** After observing ROCHA stop at that address for a  
13 couple of minutes and then leave, agents intercepted an outgoing call (Session 134 over  
14 TT24) from ROCHA (TT24) to Sillas (TT28). ROCHA told Sillas that ORDONEZ was  
15 not answering his phone calls, so he (ROCHA) left. At 9:10 p.m., agents intercepted an  
16 outgoing call (Session 145 over TT24) from ROCHA (TT24) to ORDONEZ (TT40),  
17 during which ROCHA and ORDONEZ agreed to meet. At 9:14 p.m., agents on  
18 surveillance watched ROCHA drive back to **34402 28th Pl. SW, Federal Way,** for what  
19 I believe was ROCHA's delivery of 200 pills to ORDONEZ, as mentioned in their  
20 previous conversation. After ROCHA's suspected drug delivery, ROCHA told Sillas  
21 (Session 150 over TT24) that he was going to "count Guero's [ORDONEZ's] money,"  
22 indicating ROCHA had met with ORDONEZ, delivered drugs to him, and received  
23 money from ORDONEZ.

24 227. On August 16, 2018, a DEA undercover agent (UC) purchased 148.3 gross  
25 grams (including packaging) of a substance that field-tested positive for the presence of  
26 methamphetamine from ORDONEZ, for \$1,000, in Federal Way, Washington. Prior to  
27 meeting with ORDONEZ, agents gave the UC an electronic recording device. When the  
28 UC and ORDONEZ met, ORDONEZ introduced himself to the UC as "Gauge,"



1 ORDONEZ's middle name. ORDONEZ then spoke to the UC and described the two  
2 kinds of methamphetamine he had to offer for purchase. The first type, which agents  
3 believe was in ORDONEZ's truck (a **tan Chevy Silverado bearing Washington license**  
4 **C67402H**) or on his person at that time, ORDONEZ described as "baby shards." The  
5 second type he described as "bigger crystals," but said that type was in his house. The  
6 UC decided on the baby shards and ORDONEZ went to his **tan Chevy Silverado**  
7 **bearing Washington license C67402H**. When ORDONEZ returned to the UC with the  
8 drugs, the UC negotiated a purchase price of \$1,000 for a quarter-pound of suspected  
9 methamphetamine. After the two agreed on the price and completed the transaction, the  
10 UC obtained two phone numbers for ORDONEZ (TT40 and TT41). The UC also learned  
11 from ORDONEZ that if he/she needed to buy more methamphetamine, he/she could use  
12 TT40 and TT41 interchangeably to contact ORDONEZ for that purpose. After this  
13 transaction, agents followed as ORDONEZ drove his **tan Chevy Silverado bearing**  
14 **Washington license C67402H** back to **34402 28th Pl. SW, Federal Way, Washington.**

15       228. Agents installed a mounted surveillance camera at **34402 28th Pl. SW,**  
16 **Federal Way, Washington** and watched ORDONEZ come and go from this residence  
17 daily. Agents then activated real-time tracking on ORDONEZ's phones; this showed  
18 ORDONEZ also frequented **34235 18th Pl. S, Federal Way, Washington**. This tracking  
19 more specifically showed ORDONEZ frequently remained at **34235 18th Pl. S, Federal**  
20 **Way, Washington** overnight. From this, agents believe **34235 18th Pl. S, Federal Way,**  
21 **Washington** may be a secondary or new residence for ORDONEZ. During the end of  
22 October 2018 and as recently as November 3, 2018, tracking data associated with TV4  
23 showed the device traveled to **34235 18th Pl. S, Federal Way, Washington** several  
24 times and stayed there for short amounts of time on each instance, consistent with drug  
25 transactions. On one such instance, on October 19, 2018, agents traveled to **34235 18th**  
26 **Pl. S, Federal Way, Washington**—just after TV4 had left the residence—and saw  
27 ORDONEZ's **tan-colored Chevy Silverado bearing Washington license C67402H**  
28 parked at the residence.

1        229. I believe ORDONEZ certainly utilizes both locations to store drugs and  
2 drug-proceeds. I believe he is currently residing at **34235 18th Pl. S, Federal Way,**  
3 **Washington**, and using that location to conduct drug transactions with the CASTRO  
4 DTO based on physical and electronic surveillance.

5        230. ORDONEZ has criminal history in California and Washington, dating back  
6 to 2009. In 2016, ORDONEZ was convicted of third degree possession of stolen  
7 property and driving under the influence; in 2017, he was convicted of first-degree  
8 criminal trespass, second-degree vehicle prowling, and making a false or misleading  
9 statement to a public servant. All of these convictions were gross misdemeanors and  
10 were in Washington. ORDONEZ was most recently arrested in October 2018 for attempt  
11 to elude, hit and run-attended-property damage, possession of a stolen firearm, and theft  
12 of a motor vehicle.

13            **p) Location 16. Residence of Monique GREEN: 1020 SW 305th St.,**  
14            **Federal Way, Washington.**

15        231. Agents identified DTO redistributor Monique GREEN through a  
16 combination of telephone tolls analysis and WADOL research. The phone GREEN has  
17 used to contact ROCHA is subscribed to "Nikki Green" at the address where public  
18 records list Monique GREEN has lived previously. Additionally, internet research  
19 identified a Facebook account that positively matches physical surveillance of GREEN  
20 and her WADOL driver's license photograph.

21        232. On July 14, 2018 agents intercepted several text messages between Sillas  
22 (TT28) and ROCHA (TT24). At 4:48 p.m., Sillas messaged (Session 172) ROCHA  
23 stating, "Pick up paper is the dark skinned girl." "Dark skinned girl" or "morenita" has  
24 been a consistent term used to refer to GREEN. At 4:49 p.m., ROCHA messaged  
25 (Session 174) Sillas stating, "Just to pick up paper, are you going to give her anything?"  
26 A minute later, Sillas messaged (Session 176) ROCHA stating, "Just paper. It's a little  
27 bit, like 3,500." A lone agent went out to conduct surveillance of this meeting of his own  
28 accord. That agent observed ROCHA park TV5 in Walmart parking lot in Federal Way

1 before exiting TV5 and entering the Walmart. About fifteen minutes later, ROCHA  
2 exited the Walmart, returned to TV5, and left the Walmart. Shortly after GREEN was  
3 observed in TV5 with ROCHA. Agents believe ROCHA and GREEN conducted their  
4 transaction while GREEN was inside TV5. Once the transaction was completed,  
5 ROCHA immediately called Sillas to say he had spotted a suspicious vehicle and  
6 described the lone agent's vehicle exactly. Sillas directed ROCHA to get a new phone  
7 immediately, and there were no further communications over ROCHA's phone.

8       233. On August 29, 2018, agents intercepted Sillas asking ROCHA to check up  
9 on GREEN because she was going to bring ROCHA a "ticket." On August 30, 2018,  
10 ROCHA told Sillas he just met GREEN and she gave him "8" (\$8,000); this was part of a  
11 series of money pick-ups from DTO redistributors that took place on August 30, 2018, as  
12 discussed throughout this Affidavit. ROCHA also told Sillas that he had given GREEN  
13 "10 pieces" during Session 180, on August 31, 2018, indicating GREEN had received  
14 250 grams of heroin from ROCHA on a prior occasion. A "piece" is a slang term for a  
15 25-gram increment of heroin, and is typically only used to refer to that drug. Intercepted  
16 communications indicate GREEN typically receives 250 grams of heroin from ROCHA  
17 and/or LOPEZ.

18       234. On August 30, 2018, agents intercepted conversation between ROCHA  
19 (TT43) and Sillas (TT33). During that conversation, ROCHA told Sillas that he would  
20 be meeting with GREEN later that day. Agents later intercepted text messages between  
21 ROCHA (TT43) and GREEN, using phone number 253-431-8583 (TT39). Through  
22 those text messages, GREEN negotiated when to meet ROCHA. Agents subsequently  
23 observed ROCHA, driving TV5, meet GREEN. Immediately following that meeting,  
24 agents intercepted a call between ROCHA and Sillas. During that call ROCHA told  
25 Sillas that he met with GREEN and she "gave him 8," believed to be a reference to  
26 \$8,000. This is just one instance where GREEN arranged to meet with members of the  
27 CASTRO DTO that agents observed through physical and electronic surveillance.  
28

1           235. On August 30, 2018, Special Agent DelVecchio received authorization  
2 from the Honorable David W. Christel, United States Magistrate Judge for the Western  
3 District of Washington, to activate real-time tracking of TT39. In September 2018,  
4 tracking data indicated that GREEN was residing at **1020 SW 305th St., Federal Way,**  
5 **Washington.** Tracking data for TT39 has continuously indicated GREEN remained  
6 overnight and (during many days) at **1020 SW 305th St., Federal Way, Washington.**  
7 TT39's tracking has also been helpful to agents conducting surveillance of GREEN's  
8 suspected drug trafficking activities with the CASTRO DTO. For example, on  
9 September 14, 2018, tracking data showed GREEN left **1020 SW 305th St., Federal**  
10 **Way, Washington,** and traveled directly to her meeting with LOPEZ (which was  
11 observed by agents on physical surveillance). On October 10, 2018, after 1:30 p.m.,  
12 agents intercepted many communications between GREEN and LOPEZ (over TT51) that  
13 indicated the two would soon be meeting to conduct a drug transaction. TT39's tracking  
14 indicated GREEN was at **1020 SW 305th St., Federal Way, Washington,** during many  
15 of these communications. At 5:42 p.m., GREEN sent the following meeting location to  
16 LOPEZ, via text message: "2005 South 320th, 98003." This is the address to the  
17 Commons Mall in Federal Way.

18           236. TT39's tracking indicated GREEN was at **1020 SW 305th St., Federal**  
19 **Way, Washington,** during this intercepted communication as well. In subsequent  
20 messages, LOPEZ and GREEN agreed to meet at the mall around 6:45 p.m. Real-time  
21 tracking associated with TT39 indicated GREEN left **1020 SW 305th St., Federal Way,**  
22 **Washington,** and traveled to the mall to meet LOPEZ. Though the two had quite a  
23 confusing experience while trying to meet, agents on physical surveillance confirmed  
24 GREEN and LOPEZ eventually found each other and met for a suspected drug  
25 transaction. TT39's tracking showed GREEN then traveled back to **1020 SW 305th St.,**  
26 **Federal Way, Washington.** I believe GREEN is storing drugs and drug proceeds at  
27 **1020 SW 305th St., Federal Way, Washington,** based on intercepted communications  
28 in conjunction with physical and electronic surveillance.

1           237. GREEN's criminal history consists of an infraction for no valid operator's  
2 license and DWLS 3.

3           **q) Location 17.** Residence of Rolando ESPINDOLA Hernandez and Jessica  
4 JOHNSON: **314 N 133rd St., Seattle, Washington.**

5           238. Rolando ESPINDOLA Hernandez and Jessica JOHNSON each maintain a  
6 Washington driver's license in their names, which lists their address as **314 N 133rd St.,**  
7 **Seattle, Washington.** Physical and electronic surveillance of several CASTRO DTO  
8 members, including LOPEZ, HEREDIA, ROCHA, JOHNSON, and ESPINDOLA, has  
9 confirmed this information.

10          239. When agents first identified Carlos LOPEZ as a member of this  
11 organization, they began using physical and electronic surveillance means to follow his  
12 movements. Toward the end of 2017 and the beginning of 2018, agents began to notice  
13 LOPEZ's regular trips to **314 N 133rd St., Seattle, Washington.** Once agents  
14 determined LOPEZ (sometimes accompanied by FRIAS) was meeting ESPINDOLA  
15 and/or JOHNSON, they checked with their federal, state, and local law enforcement  
16 counterparts regarding ESPINDOLA and JOHNSON and learned an HSI agent had  
17 identified ESPINDOLA and JOHNSON as money launderers for a number of local drug  
18 trafficking groups. HSI believed ESPINDOLA and JOHNSON were using funnel bank  
19 accounts to transfer a portion of the CASTRO DTO's drug proceeds from Washington to  
20 Mexico.

21          240. HSI provided DEA with information that showed ESPINDOLA and  
22 JOHNSON's ties to these other organizations, mostly in the form of their making  
23 deposits into an array of "funnel" bank accounts. The sole purpose of a "funnel" account  
24 is to rapidly input (or "funnel") large sums of money, usually from a variety of input  
25 sources and typically under the \$10,000 bank reporting requirement, to one account; then  
26 just as rapidly (if not all at once) remove that money from the same account, but in a  
27 different location. In this instance, ESPINDOLA and JOHNSON were two of over a  
28 dozen individuals in Washington HSI agents identified who were depositing money into

1 accounts that were mostly at Wells Fargo Bank. Until recently, Wells Fargo Bank was  
2 the only US-based bank that allowed individuals to deposit cash into an account without  
3 providing any form of identification. As the deposits flowed into these Wells Fargo  
4 accounts in Washington, similar amounts were withdrawn in Wells Fargo Bank branches  
5 in Arizona and California. HSI and DEA investigations have linked ESPINDOLA,  
6 JOHNSON, and others to funnel accounts that have moved tens of millions of dollars.  
7 Agents have reviewed bank surveillance footage at a number of branches in Western  
8 Washington that showed ESPINDOLA and JOHNSON making cash deposits into these  
9 aforementioned funnel accounts.

10 241. During the end of 2017 and the first quarter of 2018, physical and  
11 electronic surveillance of LOPEZ and (eventually) ROCHA showed they both made  
12 regular, short-stay trips to **314 N 133rd St., Seattle, Washington**. Physical and  
13 electronic surveillance also showed HEREDIA made frequent trips to **314 N 133rd St.,**  
14 **Seattle, Washington**. Banking records have shown ESPINDOLA and his wife  
15 (JOHNSON) made a number of cash deposits into several "funnel" bank accounts  
16 identified by financial investigators, and that some of these deposits were made around  
17 the same times LOPEZ, ROCHA, and HEREDIA had briefly visited **314 N 133rd St.,**  
18 **Seattle, Washington**.

19 242. A "funnel" account is a bank account that exploits the multiple branch  
20 locations of a financial institution. It involves illegal funds, usually cash, deposited into  
21 an account in a geographical location outside of where that account was opened; the  
22 deposits are made by individuals with no relationship to the account owner. The deposits  
23 in one location provides immediate access to the money by the account owner, in another  
24 location, via withdrawals or bank wires. To avoid further detection by law enforcement,  
25 individual deposits are made in amounts less than \$10,000; however, multiple deposits  
26 can be made to the same account at different branches or days.

27 243. On May 8, 2018, Wells Fargo Bank enacted a new policy regarding cash  
28 deposits. Wells Fargo will "only accept cash for deposit when presented by an account



owner or signer on the Wells Fargo consumer checking or savings deposit account.”

According to Wells Fargo, they created this policy to reduce criminal activity and protect customer’s accounts.

244. Financial records received as a part of this investigation confirm ESPINDOLA resides at 314 N 133rd St., Seattle, Washington.

245. As stated above, investigators have identified ESPINDOLA as depositing cash to Wells Fargo funnel accounts on numerous occasions during 2016, 2017, and 2018. Surveillance photos have identified both ESPINDOLA and his girlfriend/wife, Jessica JOHNSON, traveling to multiple branches of Wells Fargo on the same day; bank records show both ESPINDOLA and JOHNSON made cash deposits to multiple accounts on those days.

246. Wells Fargo Bank records show ESPINDOLA has made at least 46 separate deposits to funnel accounts from July 2016 through February 2018. JOHNSON has been identified in at least 27 cash deposits between March 2017 and February 5, 2018. ESPINDOLA and/or JOHNSON are identified as the individuals making these deposits through bank surveillance photos or their driver’s license information captured at the time of deposit; any other deposits made by either ESPINDOLA or JOHNSON would likely not be discovered by law enforcement if the individual deposit amount was less than \$10,000.

247. The following transactions include known deposits by ESPINDOLA from April 2017 to February 2018, into identified funnel accounts:

Date & Time	Deposit information
04/17/17 3:51 p.m.	Rolando Espindola Hernandez deposit to Alejandro Ortiz Reyna Wells Fargo Account 3558 Highlands AU 06936
04/18/17 1:35 p.m.	Rolando Espindola Hernandez deposit to Rogelio Gonzalez Murillo Wells Fargo Account 2162 Aurora AU 06899
04/19/17 3:50 p.m.	Either Rolando Espindola Hernandez or Erasmo Olvera Santos deposit to Rogelio Gonzalez Murillo Wells Fargo Account 2162 Highlands AU 06936
04/25/17 10:07 a.m.	Rolando Espindola Hernandez deposit to Alejandro Ortiz Reyna Wells Fargo Account 3558 Highlands AU 06936



<b>Date &amp; Time</b>	<b>Deposit information</b>
05/25/17 2:56 p.m.	Rolando Espindola Hernandez \$3,600 cash deposit to Adriana Martinez Wells Fargo Account 9822 Highlands AU 06936
06/08/17 1:59 p.m.	Rolando Espindola Hernandez \$5,000 cash deposit to Juan J Wong Gonzalez Wells Fargo Account 3635883527 Kenmore AU13601
06/08/17 2:37 p.m.	Rolando Espindola Hernandez \$4,000 cash deposit to Joel Wong Gonzalez Wells Fargo Account 2327213407 Seattle AU 6899
06/09/17 3:54 p.m.	Rolando Espindola Hernandez \$1,000 cash deposit to Juan J Wong Gonzalez Wells Fargo Account 3635883527 Highlands AU 06936
06/10/17 1:54 p.m.	Rolando Espindola Hernandez \$6,000 cash deposit to Marcos Alvarado Wells Fargo Account 3802 Edmonds AU 6921
06/20/17 1:22 p.m.	Rolando Espindola Hernandez \$6,000 cash deposit to Rogelio Gutierrez Wells Fargo Account 2750 Lynnwood AU 06962
07/28/17 3:39 p.m.	Rolando Espindola Hernandez \$5,000 cash deposit to Cesar Lazalde Wells Fargo Account 7441 Shoreline AU 6936
8/9/2017	Rolando Espindola Hernandez \$5,000 cash deposit Angel Valdez Wells Fargo Account 7846902638 to Highlands AU 06936
08/16/17 1:48 p.m.	Rolando Espindola Hernandez \$7,000 cash deposit to Wells Fargo Account 9303 Chelan AU62918
8/26/2017	Rolando Espindola Hernandez \$5,000 cash deposit to Cesar Lazalde Wells Fargo Account 7441 Edmonds AU 6921 (posted 8/28)
09/02/17 4:36 p.m.	Rolando Espindola Hernandez \$5,000 cash deposit to Angel Valdez Wells Fargo Account 7846902638 AU6899
09/09/17 1:40 p.m.	Rolando Espindola Hernandez \$5,000 cash deposit to Jorge Arce Grijalva Wells Fargo Account 8563435604 Seattle AU 6899
10/11/17 12:32 p.m.	Rolando Espindola Hernandez \$5,000 cash deposit to Maria Fernando Bojorquez Wells Fargo Account 7699 Lynnwood AU 06962
10/11/17 1:23 p.m.	Rolando Espindola Hernandez \$5,000 cash deposit to Maria Fernando Bojorquez Wells Fargo Account 2622707988
10/17/17 1:56 p.m.	Rolando Espindola Hernandez \$1,500 cash deposit to Alejandra Duarte Wells Fargo Account 3686530571 Seattle AU 6899
11/20/17 3:32 p.m.	Rolando Espindola Hernandez \$5,000 cash deposit to Eduardo Arturo Azuara Castro Wells Fargo Account 3686999867 Shoreline AU 6936
12/15/17 11:22 a.m.	Rolando Espindola Hernandez \$5,000 cash deposit to Manuel G Servin Wells Fargo Account 2625617234 Lynnwood AU 62946
12/15/17 11:39 a.m.	Rolando Espindola Hernandez \$5,000 cash deposit to Miguel A Guillen Palacios Wells Fargo Account 3594216172 Lynnwood AU 06962
01/05/18 4:46 p.m.	Rolando Espindola Hernandez \$5,000 cash deposit to Mario Bracamonte Wells Fargo Account 6550764093 Seattle AU 1733

<b>Date &amp; Time</b>	<b>Deposit information</b>
01/16/18 5:55 p.m.	Rolando Espindola Hernandez \$3,000 cash deposit to Mario Bracamonte Wells Fargo Account 6550764093 Federal Way AU 1737
01/22/18 2:50 a.m.	Rolando Espindola Hernandez \$4,000 cash deposit to Manuel G Servin Wells Fargo Account 2625617234 Seattle AU 6899
01/22/18 2:41 p.m.	Rolando Espindola Hernandez \$4,000 cash deposit to Miguel A Guillen Palacios Wells Fargo Account 3594216172 Shoreline AU 6936
01/30/18 2:28 p.m.	Rolando Espindola Hernandez \$2,500 cash deposit to Mario Bracamonte Wells Fargo Account 6550764093 Shoreline AU 6936
02/08/18 4:25 p.m.	Rolando Espindola Hernandez \$4,500 cash deposit to Wells Fargo Account 2623857337 Manuel G Servin Lynnwood AU 62946

248. Financial records showed Jessica JOHNSON also frequently structured cash deposits into Wells Fargo funnel accounts; below are known transactions for JOHNSON during 2017 and 2018:

<b>Date &amp; Time</b>	<b>Deposit information</b>
3/23/2017	Jessica Johnson \$8,000 cash deposit to Jose Rueda Wells Fargo Account 3341802696
04/05/17 2:43 p.m.	Jessica Johnson \$9,000 cash deposit to Sayda Santillanes Wells Fargo Account 0064 AU1683
04/06/17 2:34 p.m.	Jessica Johnson \$6,500 cash deposit to Cesar J Ruiz Wells Fargo Account 4463 Seattle AU 6899
04/25/17 11:43 a.m.	Jessica Johnson deposits to Rogelio Gonzalez Murillo Wells Fargo Account 2162 Highlands AU 06936
04/27/17 3:45 p.m.	Jessica Johnson \$5,000 cash deposit to Ernesto Sandoval Wells Fargo Account 5971 Lynnwood AU 06962
06/08/17 12:48 p.m.	Jessica Johnson \$6,000 cash deposit to Juan J Wong Gonzalez Wells Fargo Account 3635883527 Highlands AU 06936
06/08/17 2:05 p.m.	Jessica Johnson \$6,000 cash deposit to Joel Wong Gonzalez Wells Fargo Account 2327213407 Kenmore AU13601
06/20/17 10:23 a.m.	Jessica Johnson \$6,000 cash deposit to Cesar J Ruiz Wells Fargo Account 4463 Seattle AU 6901
06/20/17 12:39 p.m.	Jessica Johnson \$7,000 cash deposit to Mayra Aleman Wells Fargo Account 5731 Seattle AU 2426
06/20/17 1:35 p.m.	Jessica Johnson cash deposit to Sergio Juarez Martinez Wells Fargo Account 3120 West Lynnwood AU 62950
08/02/17 2:50 p.m.	Jessica Johnson \$7,000 cash deposit to Joel Wong Gonzalez Wells Fargo Account 2327213407 Kenmore AU13601

Date & Time	Deposit information
8/9/2017	Jessica Johnson \$7,000 cash deposit to Cesar Lazalde Wells Fargo Account 7441 Aurora AU 06899
08/11/17 12:59 p.m.	Jessica Johnson \$7,000 cash deposit to Eduardo R Quezada Wells Fargo Account 6959 Kenmore AU13601
09/11/17 12:03 p.m.	Jessica Johnson \$5,000 cash deposit to Daniela Lozoya Martinez Wells Fargo Account 3553 Seattle AU 6899
10/10/17 10:54 a.m.	Jessica Johnson \$8,000 cash deposit to Joel Wong Gonzalez Wells Fargo Account 2327213407 Seattle AU 2426
10/30/17 4:47 p.m.	Jessica Johnson \$7,000 Cash deposit to Pedro G Garcia Wells Fargo Account 1035 Shoreline AU 6936
11/13/17 5:37 p.m.	Jessica Johnson \$8,000 cash deposit to Joel Wong Gonzalez Wells Fargo Account 2327213407 Seattle AU 6899
11/13/17 5:45 p.m.	Jessica Johnson \$7,000 cash deposit to Joel Wong Gonzalez Wells Fargo Account 2327213407 Shoreline AU 6936
11/20/17 3:30 p.m.	Jessica Johnson \$6,500 cash deposit to Jesus Manuel Almanza Wells Fargo Account 8372481369 Seattle AU 6901
11/27/17 2:08 p.m.	Jessica Johnson \$7,000 cash deposit to Andree R Robles Wells Fargo Account 7699 Edmonds AU 6921
11/29/17 4:04 p.m.	Jessica Johnson \$5,500 cash deposit to Jose Guadalupe Perales Wells Fargo Account 3729752042 Shoreline AU 6936
12/05/17 10:26 a.m.	Jessica Johnson \$7,000 cash deposit to Jose D Madrigal Wells Fargo Account 1104 Bothell AU 6913
01/03/18 1:48 p.m.	Jessica Johnson \$8,000 cash deposit to Miguel A Guillen Palacios Wells Fargo Account 3594216172 Kent AU 6949
01/03/18 1:50 p.m.	Jessica Johnson \$8,000 cash deposit to Luis G Garcia Wells Fargo Account 9397 Kent AU 6949
01/22/18 5:51 p.m.	Jessica Johnson \$5,500 cash deposit to Miguel A Guillen Palacios Wells Fargo Account 3594216172 Everett AU 6924
01/23/18 10:53 a.m.	Jessica Johnson \$5,500 cash deposit to Manuel G Servin Wells Fargo Account 2625617234 Federal Way AU 1737
02/05/18 5:17 p.m.	Jessica Johnson \$5,000 cash deposit to Cesar Gonzalez Montero Wells Fargo Account 2626407837 Lynnwood AU 62946

249. A comparison of the two tables shows—in addition to JOHNSON and ESPINDOLA structuring cash deposits in amounts of less than \$10,000 to avoid triggering reporting requirements—they are also working together to spread those deposits across multiple days, Wells Fargo branch locations, and/or different bank

1 accounts. For example, on April 25, 2017, both JOHNSON and ESPINDOLA made cash  
2 deposits at the Highlands Wells Fargo Branch (AU 06936).

3 250. Further, on June 8, 2017, both JOHNSON and ESPINDOLA made cash  
4 deposits totaling \$11,000 to two different accounts at the Highlands branch of Wells  
5 Fargo. The time of each deposit, 1:59 p.m. and 2:05 p.m., indicates both JOHNSON and  
6 ESPINDOLA were likely in the branch together, but making separate deposits to two  
7 different Wells Fargo funnel accounts; each of their deposits was less than \$10,000 and  
8 made to different accounts, therefore not triggering any reporting requirement.

9 251. Agents have also seen ESPINDOLA conducting suspicious transactions  
10 with other people after meeting with DTO members such as HEREDIA, ROCHA, and  
11 LOPEZ. Agents believe ESPINDOLA and JOHNSON are coordinating their money  
12 laundering efforts with others as an additional way to conceal the source of the funds as  
13 well as their involvement in that concealment. For example, on March 20, 2018, agents  
14 began a surveillance operation in the afternoon. At about 12:30 p.m., real-time tracking  
15 data associated with TV2 showed the vehicle was at LOPEZ's residence at that time, Unit  
16 I-101 at the Emerald Pointe Condominiums in Auburn, Washington. From there, GPS  
17 tracking showed TV2 traveled directly to **314 N 133rd St., Seattle, Washington**.  
18 Special Agent DelVecchio was able to physically follow TV2 for a period just before it  
19 arrived at **314 N 133rd St., Seattle, Washington**, and confirmed LOPEZ was the driver  
20 of TV2 and ROCHA (then unidentified) was the passenger.

21 252. Special Agent DelVecchio used physical surveillance means as well as a  
22 mounted surveillance camera at **314 N 133rd St., Seattle, Washington** to watch LOPEZ  
23 and ROCHA's activities. ESPINDOLA was not actually at the residence when LOPEZ  
24 and ROCHA arrived just after 1:20 p.m. Special Agent DelVecchio watched  
25 ESPINDOLA arrive at the residence at 1:26 p.m. in a **red Mitsubishi Eclipse bearing**  
26 **Washington license AEV9270** (registered to ESPINDOLA's wife, Jessica JOHNSON).  
27 ESPINDOLA greeted LOPEZ and ROCHA and the three men went into **314 N 133rd**  
28 **St., Seattle, Washington**. Agents saw ESPINDOLA, LOPEZ, and ROCHA walk out of

1 314 N 133rd St., Seattle, Washington, a few minutes later. ESPINDOLA got back into  
2 his vehicle and the other two men got into TV2; LOPEZ was once again driving TV2.

3 253. Special Agent DelVecchio followed both vehicles as they left the residence  
4 in the same direction. At 1:38 p.m., TV2 turned toward Interstate 5 and ESPINDOLA  
5 continued onto Westminster Way North and then onto Aurora Avenue North. SOG  
6 Detective Ejde and Special Agent DelVecchio continued to monitor the real-time  
7 tracking data for TV2, but Agent DelVecchio physically followed ESPINDOLA.

8 254. ESPINDOLA drove directly to the parking lot for "La Plaza Latina,"  
9 located at 17034 Aurora Avenue North, Shoreline, Washington. ESPINDOLA parked  
10 near a silver Infiniti sedan bearing Washington license BIV2976, registered to Juan G  
11 (Gabriel) Herrero Vazquez at 913 North 177th Street, Shoreline, Washington. Special  
12 Agent DelVecchio saw the driver of that sedan and positively identified him as Herrero  
13 based on Herrero's WADOL photograph. ESPINDOLA and Herrero met in the parking  
14 lot of the aforementioned business and remained standing by Herrero's vehicle for the  
15 duration of Agent DelVecchio's observations. ESPINDOLA took a small bag out of his  
16 **red Mitsubishi Eclipse bearing Washington license AEV9270** and placed it on the  
17 trunk lid of Herrero's car. The two conversed at Herrero's vehicle for some time, with  
18 the bag between them, before Herrero took possession of the bag. Special Agent  
19 DelVecchio could not see where, exactly, Herrero put the bag due to traffic conditions at  
20 that time, but it looked like he placed it in his Infiniti sedan, behind the driver's seat.  
21 Agents believe this was likely either drugs or drug proceeds, based on their training and  
22 experience, and knowledge of the CASTRO DTO. Agents believe ESPINDOLA likely  
23 received drug proceeds from ROCHA and LOPEZ, and then transferred a portion of  
24 those proceeds to Herrero, for him to launder in addition to ESPINDOLA and  
25 JOHNSON's own work. However, agents did not rule out the possibility that  
26 ESPINDOLA requested drugs from LOPEZ and ROCHA—on behalf of Herrero—and  
27 then subsequently delivered those drugs to Herrero, once he had received them from  
28

1 ROCHA and LOPEZ. This parking lot exchange between ESPINDOLA and Herrero was  
2 indicative of such drug trafficking behavior.

3 255. As time went on, agents did not see members of the CASTRO DTO travel  
4 to **314 N 133rd St., Seattle, Washington**, nearly as much. HEREDIA still traveled there  
5 for short-duration visits from time to time, but LOPEZ and ROCHA almost stopped  
6 traveling there altogether. At first, agents believed there might have been a falling-out  
7 between these individuals, but then agents realized Wells Fargo's policy changed around  
8 that same time. In part, the policy change prevented people—such as ESPINDOLA and  
9 JOHNSON—from making cash deposits into Wells Fargo bank accounts without  
10 providing identification. I believe this shift in regulations made it impossible for people  
11 like ESPINDOLA and JOHNSON anonymously to deposit money into funnel accounts,  
12 and it certainly made it more difficult for them to generally deposit money into DTO  
13 bank accounts (thereby beginning the laundering process).

14 256. At the very least, ESPINDOLA, JOHNSON, and other DTO members  
15 realized the federal government and US banking system would be able to track  
16 individuals making deposits in a way they had not previously. I believe this changed the  
17 DTO's money movement methods. It was around this same time agents began seeing an  
18 uptick in communications between CASTRO DTO members in Western Washington and  
19 Gregory WERBER. After March 2018, HEREDIA and ROCHA were in communication  
20 with WERBER when, as far as agents know, they previously were not. I believe this  
21 shift in Wells Fargo's policy pushed ESPINDOLA and JOHNSON out of their money  
22 laundering positions with the DTO and allowed WERBER to take a more prominent role,  
23 since he was (and still is) using his cryptocurrency business to launder a portion of the  
24 DTO's drug proceeds. The DTO also continues to use the more traditional money  
25 movement methods such as wire transfers from small Mexican markets (i.e., Cindy  
26 SOLTERO and Orlando BARAJAS' stores) and bulk cash smuggling. However, I  
27 believe that based on ESPINDOLA and JOHNSON's previous money laundering activity  
28



1 with the CASTRO DTO and others, their residence at **314 N 133rd St., Seattle,**  
 2 **Washington**, still contains evidence of previous money laundering.

3 257. ESPINDOLA's criminal history includes a 2004 conviction for Negligent  
 4 Driving in the First Degree, a 2008 misdemeanor arrest for DWLS, a 2008 arrest for  
 5 Alien Inadmissibility, a 2010 arrest for Alien Inadmissibility, and a 2010 arrest for  
 6 Patronizing a Prostitute. JOHNSON's criminal history includes a misdemeanor arrest for  
 7 DUI and a misdemeanor conviction for Reckless Driving in 2005, misdemeanor  
 8 convictions for DUI and refusing a DUI test in 2008, and a 2015 arrest for misdemeanor  
 9 Reckless Driving and DUI, with no available disposition.

10 r) **Location 18.** Suspected stash location for Carlos Alejandro CASTRO  
 11 Perez and Nicolas CISNEROS: **952 SW Campus Dr., Apartment 26E-**  
 12 **1, Federal Way, Washington.**

13 Agents identified Carlos Alejandro CASTRO Perez through physical surveillance  
 14 of him at his listed WADOL residence in Federal Way, and identified him as the user of  
 15 TT69 based on intercepted communications over TT51 (Carlos LOPEZ) in conjunction  
 16 with physical and electronic surveillance. CASTRO appears to both receive drugs from  
 17 and provide drugs to Carlos LOPEZ. Carlos CASTRO maintains a Washington driver's  
 18 license in that name, which lists his address as 952 Southwest Campus Drive, Apartment  
 19 29E-1, Federal Way, Washington.<sup>6</sup> Agents have confirmed this is at least one of Carlos  
 20 CASTRO's residences, based on physical surveillance of CASTRO. Agents first saw  
 21 Carlos CASTRO during surveillance of Carlos LOPEZ on October 3, 2018. That night,  
 22 agents intercepted communications over LOPEZ's phone (TT51) indicating LOPEZ  
 23 would likely pick up a pound of crystal methamphetamine from the user of TT69. After  
 24 intercepting these communications between TT51 and TT69, agents followed LOPEZ to  
 25 the **Fox Run Apartments, 34726 2nd Lane S, Federal Way, Washington.** Agents saw  
 26 LOPEZ get into TV9 empty-handed. LOPEZ exited TV9 with a brown paper bag a few

27 \_\_\_\_\_  
 28 <sup>6</sup> Although WADOL records show CASTRO's apartment as 29E-1, agents on physical surveillance saw CASTRO  
 accessing Apartment 26E-1 and thus believe he resides in Apartment 26E-1.



1 minutes later and, based on intercepted communications over TT51, agents believed  
2 CASTRO had just supplied LOPEZ with crystal methamphetamine.

3 Carlos CASTRO and LOPEZ met the night after that as well (October 4, 2018),  
4 only this time the intercepted communications between TT51 and TT69 indicated  
5 CASTRO would be supplying LOPEZ with 2,000 pills and possibly also some  
6 methamphetamine or cocaine. Agents physically watched this meeting, which also took  
7 place at the **Fox Run Apartments, 34726 2nd Lane S, Federal Way, Washington**, and  
8 in **TV9**, and then followed Carlos CASTRO back to the Glen Park at West Campus  
9 apartments located at **952 SW Campus Drive, Federal Way, Washington**. Due to the  
10 parking and traffic constraints in the apartment complex, agents were not able to follow  
11 CASTRO directly to his door at that time. During a subsequent surveillance operation in  
12 October 2018, agents observed **TV9** parked near Building 26 of the apartment complex  
13 located at **952 SW Campus Drive, Federal Way, Washington**. On that day, agents  
14 observed CASTRO exit the stairwell of Building 26 and enter **TV9**. Agents believed  
15 CASTRO had come from the E-1 apartment based on his movements on the stairwell, but  
16 examined some additional data sources to confirm their suspicions. Agents reviewed  
17 utility information for Building 26, which showed Nicolas CISNEROS, a suspected  
18 member of the CASTRO DTO and known associate of Carlos CASTRO (one of his most  
19 frequent telephone contacts), was the utilities subscriber for **952 SW Campus Dr.,**  
20 **Apartment 26E-1, Federal Way, Washington**. None of the other utilities subscribers at  
21 Building 26 had any association to CASTRO. Based on agents' observations and utilities  
22 records, agents believe CASTRO is using **952 SW Campus Dr., Apartment 26E-1,**  
23 **Federal Way, Washington** for drug trafficking purposes—in addition to another nearby  
24 apartment in Federal Way, Washington.

25 258. On October 5, 2018, agents intercepted a call between CASTRO, using  
26 TT69, and LOPEZ, using TT51. During that conversation, LOPEZ told CASTRO that  
27 the "soda" he received was already out and he (LOPEZ) would need another one.  
28

1 LOPEZ and CASTRO also discussed a drug transaction where CASTRO shorted LOPEZ  
2 by two grams of an unspecified drug.

3 259. On October 13, 2018, agents intercepted two calls between CASTRO  
4 (TT69) and LOPEZ (TT51). During that call (Session 1851), LOPEZ told CASTRO that  
5 he needed "some of the white one" and CASTRO told LOPEZ to "come over if you're  
6 going to come". During a subsequent call (Session 1900), CASTRO eventually told  
7 LOPEZ to meet at the Glen Park apartment to eliminate the threat of police patrols.  
8 Agents subsequently observed, through electronic surveillance, LOPEZ (in TV4) travel  
9 to the Glen Park at West Campus Apartments located at **952 SW Campus Dr., Federal**  
10 **Way, Washington**. LOPEZ remained in the area of the Glen Park Apartments for  
11 around one minute before departing the area. This is only one instance where agents  
12 have observed vehicles associated with the CASTRO DTO stop at the **952 SW Campus**  
13 **Dr., Federal Way, Washington** apartments. Tracking data indicates Carlos CASTRO is  
14 likely using this residence as a stash house, since real-time tracking of one of his phones  
15 (TT69) and one of his vehicles (TV9) show he spends the majority of his nights at the  
16 **Fox Run Apartments, 34726 2nd Lane S, Unit C40, Federal Way, Washington**. This  
17 same tracking data shows CASTRO stops at **952 SW Campus Dr., Federal Way,**  
18 **Washington** frequently, but does not remain there for extended periods.

19 260. Based on intercepted communications between CASTRO and other  
20 members of the CASTRO DTO including those described above, coupled with  
21 observations made by agents through physical and electronic surveillance, I believe  
22 CASTRO stores drugs and drug proceeds at **952 SW Campus Dr., Apartment 26E-1,**  
23 **Federal Way, Washington**.

24 261. CASTRO's criminal history consists of a January 2017 arrest for assault  
25 and malicious mischief; no charges were filed.  
26  
27  
28

1           s) **Location 19. Residence of Carlos Alejandro CASTRO Perez: Fox Run**  
2           **Apartments, 34726 2nd Ln. S, Unit C40, Federal Way, Washington.**

3           262. Agents first became aware of CASTRO's residence at **34726 2nd Ln. S,**  
4           **Unit C40, Federal Way, Washington,** in October 2018 as the result of intercepted calls  
5           between CASTRO (TT69) and LOPEZ (TT51). As described above in Subsection (r),  
6           agents saw two drug transactions, one on October 3 and one on October 4, 2018, take  
7           place between CASTRO and LOPEZ in the parking lot at **34726 2nd Ln. S, Federal**  
8           **Way, Washington.**

9           263. Real-time tracking data for vehicles used by couriers for the CASTRO  
10          DTO indicates that couriers have stopped over 15 times at **34726 2nd Ln. S, Unit C40,**  
11          **Federal Way, Washington,** during the past three months. Real-time tracking data  
12          associated with CASTRO's phone (TT69) has consistently shown the device remains  
13          overnight at **34726 2nd Ln. S, Unit C40, Federal Way, Washington.** Agents on  
14          physical surveillance have seen CASTRO enter **Unit C40** using a key, and they have  
15          seen him come and go from this residence multiple times.

16          264. Agents received authorization to intercept wire and electronic  
17          communications over Carlos CASTRO's phone (TT69) on November 14, 2018, and  
18          activated that intercept on that same day. During the evening of November 14, agents  
19          intercepted communications over TT69, in which one of CASTRO's suspected  
20          redistributors requested at least a pound of crystal methamphetamine and a half-kilogram  
21          of heroin (using coded language). The two agreed to conduct this transaction the next  
22          day, November 15, 2018, around 1:00 p.m. Tracking data for TT69 showed CASTRO  
23          was at **34726 2nd Ln. S, Federal Way, Washington,** in the area of **Unit C40** during the  
24          time of these communications.

25          265. After this call, agents intercepted an outgoing call on TT69 (Session 37),  
26          from CASTRO to CABRERA (on TT74). During this call, CASTRO asked if he could  
27          meet with CABRERA early on November 15, 2018. CABRERA asked him what the  
28          meeting was for and CASTRO said it was for "a cuadernito," which, based on the

1 training and experience of agents and DEA-contracted linguists, is a coded reference for a  
2 pound. CABRERA then asked if CASTRO was asking for a pound of crystal  
3 methamphetamine or something else ("of white paint?"). CASTRO confirmed he wanted  
4 methamphetamine, and asked that the delivery be before one o'clock or around twelve in  
5 the afternoon—which made sense, since he had made prior arrangements with his  
6 suspected redistributor to deliver the drugs to that person around 1:00 p.m. CABRERA  
7 told CASTRO he could make the delivery at any time and the two agreed to speak again  
8 on November 15, 2018.

9       266. On November 15, 2018, agents established physical surveillance on  
10 CASTRO in the morning. As far as agents can tell, CASTRO has two vehicles he uses to  
11 conduct his drug trafficking activities: **TV9** and **a 2012 white Hyundai Accent bearing**  
12 **California license 7CQD771 (TV10)**. Agents located both of those vehicles on that  
13 morning, at residences associated to CASTRO (**952 SW Campus Dr., Apartment 26E-**  
14 **1, Federal Way, Washington**, and **34726 2nd Ln. S, Unit C40, Federal Way,**  
15 **Washington**). At 11:36 a.m., agents intercepted an outgoing call on TT69 (Session 40)  
16 to CABRERA (on TT74). During this call, CASTRO told CABRERA that he wanted to  
17 meet in an hour at the Ross located at 13201 Aurora Avenue North, in Seattle. The two  
18 agreed to meet and CABRERA told CASTRO to call him once he was fifteen minutes  
19 away from the meeting location.

20       267. About five minutes this call, agents saw two Hispanic males exit  
21 CASTRO's apartment at **952 SW Campus Dr., Apartment 26E-1, Federal Way,**  
22 **Washington**. Agents identified one of these males as CASTRO, but have not yet  
23 identified the other. Agents believe the other Hispanic male is one of CASTRO's  
24 couriers. This unidentified Hispanic male got into **TV9** and drove directly to the  
25 aforementioned Ross store in Seattle.

26       268. Once **TV9** arrived at the Ross store, agents watched CASTRO's suspected  
27 courier get out of the vehicle and walk into the store. Agents noticed TT69's tracking  
28 data showed CASTRO had not actually left Federal Way, Washington, indicating he had

1 not traveled with the courier to make this pick up. Tracking data actually showed  
2 CASTRO remained at **34726 2nd Ln. S, Unit C40, Federal Way, Washington.**

3 269. Agents CASTRO's suspected courier make a phone call as he was entering  
4 the store and agents believe this call was to CASTRO, on a different phone number from  
5 TT69. Agents believe the suspected courier had specifically called CASTRO because,  
6 only moments after they saw him make a short phone call, agents intercepted an outgoing  
7 call on TT69 (Session 44) from CASTRO to CABRERA (TT74). This call was  
8 intercepted at 12:36 p.m. During this call, CASTRO told CABRERA, "*we* are already at  
9 Ross." This indicated to agents that CASTRO was in possession of TT69 (which was in  
10 Federal Way), so he could not possibly be at the Ross store in Seattle; and when he  
11 referred to "*we*," he actually meant "*his worker*" who *was* present at the store.  
12 CABRERA said he would be to the Ross in five minutes.

13 270. CABRERA arrived at the Ross parking lot less than ten minutes later, in his  
14 **grey Toyota Camry displaying Washington license plate BKD8497 (TV14).**  
15 CASTRO's courier came out of the Ross store a few minutes later and got into **TV9.**  
16 Agents believed the two were about to meet. Instead, agents intercepted an outgoing call  
17 (Session 51 on TT69) from CASTRO to CABRERA (TT74). At the time of this call,  
18 linguists could not clearly hear what was being said on the call, due to background noise  
19 and technical glitches. Once these issues were at least partially resolved, the content of  
20 Session 51 provided agents with some insight into the events that unfolded afterward.  
21 During this call, CASTRO told CABRERA that his worker (the Hispanic male in **TV9**)  
22 had spotted surveillance personnel at the Ross store parking lot, and suggested the two  
23 change their meeting location to the nearby Las Margaritas restaurant. CABRERA  
24 agreed and the call ended.

25 271. Agents on surveillance watched CABRERA and CASTRO's courier do  
26 exactly what had been discussed. CABRERA drove out of the Ross parking lot and  
27 moved to the restaurant parking lot. Agents attempted to covertly follow this movement,  
28 but were unsuccessful. At 1:04 p.m., (two minutes after agents had intercepted Session

51) agents intercepted Session 62 over TT69—another call from CASTRO to CABRERA (TT74). During this call, CASTRO told CABRERA that his worker had seen people following him and CABRERA. CASTRO said he worker did not feel comfortable doing the transaction with CABRERA based on what he had seen at the Ross parking lot and restaurant parking lot. CASTRO and CABRERA agreed to wait and do the drug deal later. Before the call ended, CABRERA told CASTRO, “I’m going to change my number today...” CASTRO asked him to send the phone number to CASTRO once he had changed it. Clearly, agents had been spotted on surveillance.

272. At this point, CASTRO’s courier drove to a nearby QFC grocery store parking lot and agents stopped conducting surveillance of CASTRO and CABRERA. From this call, it is very clear that CABRERA, CASTRO, and CASTRO’s courier are all adept at counter surveillance. They detected covert police surveillance quite easily, and then took the necessary precautions to make sure they were not followed (changing the meeting location) and would not be followed in the future (changing their phone numbers). Minutes after Session 62 was intercepted, agents intercepted another outgoing call on TT69 (Session 67), from CASTRO to CABRERA (TT74).

273. During this call, CASTRO said his courier was going to wait and see if he was being followed. CASTRO posited that it all might be in his courier’s imagination, but CABRERA assured him that there were certainly suspicious vehicles in the parking lot at Ross—namely, a truck that was driving around and then parked in a strange way. This matched the description of one of the surveillance vehicles that was attempting to conduct covert surveillance of the meeting between CASTRO’s worker and CABRERA that day. CASTRO said his courier would wait an hour and see if he was still being followed, if not, then they could proceed with their transaction at that time. CABRERA agreed.

274. CABRERA also suggested they switch their communications over to WhatsApp, rather than using traditional means. CASTRO pointed out that WhatsApp is more complicated and it is better to use a basic phone (one that does not have

1 applications) since it cannot be tracked like a smart phone can. CASTRO said he only  
2 carries basic phones for that reason and those are the phones he uses for drug trafficking,  
3 but he has a smart phone for personal things. The two agreed to meet in an hour if  
4 everything looked okay and CABRERA said he would send his new phone number to  
5 CASTRO.

6 275. Real time tracking of TT74 showed CABRERA went to a Metro PCS store  
7 located at 13027 Aurora Avenue North, Seattle, Washington just after 1:30 p.m. About  
8 ten minutes later, at 1:43 p.m., agents intercepted an incoming text message from  
9 CABRERA on TT74. This text message was intercepted as Session 68 and read,  
10 "2067751821 nuevo numero" [new number]. These are the digits to TT84. From this  
11 text message, agents believed CABRERA had sent CASTRO his new phone number  
12 (TT84) just as he said he would in previous sessions. Based on TT74's tracking data at  
13 about that same time, agents believe CABRERA traveled right to a Metro PCS store (a  
14 subsidiary of T-Mobile) and obtained a new phone after talking about doing that very  
15 thing with CASTRO.

16 276. TT84 is a cellular phone with service provided by T-Mobile, subscribed to  
17 Ramiro Ortega at 13530 Linden Avenue North, Seattle, Washington. T-Mobile's records  
18 show this device was activated on November 15, 2018, consistent with CABRERA's text  
19 message to CASTRO and the real-time tracking of TT74. Agents later reviewed the  
20 video surveillance footage from that same Metro PCS location around the time  
21 CABRERA was suspected to have visited the store. Sure enough, the footage showed  
22 CABRERA in the store and it looked like he purchased a phone or conducted some type  
23 of transaction at the store counter—once again consistent with his statements and  
24 messages to CASTRO on TT69.

25 277. At 1:44 p.m. on that same day, agents intercepted an outgoing call (Session  
26 71 on TT69) from CASTRO (TT69) to the user of TT84. During that call, CASTRO  
27 continued the previous conversation he was having with CABRERA, about the  
28 suspicious trucks that were following CASTRO's courier and CABRERA. DEA-



1 contracted linguists immediately recognized CABRERA's voice as the user of TT84.  
2 During the call, CASTRO told CABRERA that he thought his worker had just gotten  
3 scared. CASTRO said this in a way that conveyed he thought his worker was paranoid.  
4 CABRERA told CASTRO that he also thought the truck in the parking lot was "really  
5 weird" because it was "going around and around, all weird." From this call, agents  
6 believed CABRERA was very serious about immediately changing his phone due to  
7 police surveillance detection, and had done so less than an hour after the incident.  
8 Clearly, CABRERA takes his tradecraft very seriously and does not take any risks when  
9 it comes to his drug trafficking enterprise.

10 278. At about 6:00 p.m. on November 15, TT74 stopped transmitting real-time  
11 tracking data. Instead, it showed the result code "Absent Subscriber." This typically  
12 means the user of a particular device is either out of the country, the phone is powered  
13 off, or the device has been deactivated. Given the intercepted calls over TT69, agents  
14 believed TT74 had clearly been deactivated. Based on subsequent physical surveillance  
15 and intercepted communications over TT69, agents believe CASTRO's courier returned  
16 to **34726 2nd Ln. S, Unit C40, Federal Way, Washington**. Based on my knowledge of  
17 drug traffickers, I believe he likely returned the money he was supposed to give to  
18 CABRERA in exchange for CABRERA's crystal methamphetamine, to CASTRO.

19 279. Based on intercepted communications between CASTRO and other  
20 members of the CASTRO DTO, coupled with observations made by agents through  
21 physical and electronic surveillance, I believe CASTRO conducts his drug trafficking  
22 coordination from this location and likely stores drugs and drug proceeds at **34726 2nd**  
23 **Ln. S, Unit C40, Federal Way, Washington** as well, since agents watched him conduct  
24 at least two drug transactions with LOPEZ at this very apartment complex.

25 t) **Location 20. Residence of Emmanuel REYES Perez: 2136 S 260th St.,**  
26 **Apartment CC-201, Des Moines, Washington.**

27 280. On August 30, 2018, at 3:02 p.m., agents intercepted an incoming call to  
28 ROCHA on TT43 (Session 122), from 206-231-1862 (TT49). During this call, the male

1 using 206-231-1862 (later identified as REYES as further described below) spoke with  
2 ROCHA, and ROCHA told REYES, "I'm calling on Perraca's behalf." ROCHA also  
3 referred to picking up a "ticket" [cash drug proceeds] in this call. REYES (TT49) told  
4 ROCHA he was located in Kent, Washington, and ROCHA told REYES he was located  
5 in Auburn, Washington. The two agreed to meet and to speak further over WhatsApp;  
6 REYES additionally told ROCHA he would send him an address over WhatsApp where  
7 they could meet.

8 281. Agents did not intercept any further communications between ROCHA and  
9 REYES (TT49), likely because they moved their communications to WhatsApp. I  
10 believe ROCHA needed to pick up drug money (or a "ticket") from REYES; hence, the  
11 reason ROCHA told REYES he was calling to "pick up a ticket." I believe REYES  
12 (TT49) is another drug distributor for the CASTRO DTO in Western Washington. In this  
13 instance, I believe ROCHA was calling REYES (TT49) to collect the money owed from  
14 ROCHA's prior delivery of high-quality heroin (or "perraca") to REYES.

15 282. A few minutes after this call with REYES (TT49) on August 30, 2018,  
16 agents intercepted another incoming call on TT43 (Session 123), from Sillas (TT33).  
17 During this call, ROCHA discussed his upcoming travel plans with Sillas. ROCHA told  
18 Sillas he was going to meet with REYES (or "the youngster"), then he was going to meet  
19 with Monique GREEN (or "La Morena"), and that both meetings were for suspected drug  
20 money pickups ("count that and what the youngster gave me"). ROCHA also told Sillas  
21 he and Carlos LOPEZ were going to get a phone (or "calculator") for LOPEZ. TT43's  
22 real-time tracking indicated ROCHA (and presumably Carlos LOPEZ) traveled from  
23 Auburn to Kent, and went to a Fred Meyer grocery store parking lot in Kent, Washington.  
24 I believe the purpose of this trip was for ROCHA and LOPEZ to meet with REYES  
25 (TT49). Unfortunately, agents on physical surveillance were not able to observe the  
26 meeting between ROCHA, LOPEZ, and REYES (TT49). Agents wanted to maintain the  
27 clandestine nature of their surveillance efforts on ROCHA and LOPEZ, so they relied  
28 more heavily on TT43's real-time tracking rather than closely maintaining physical

1 surveillance throughout that day. Unfortunately, after this call with Sillas, agents  
2 experienced some technical malfunctions with TT43's tracking data and fell too far  
3 behind ROCHA's actual position. Traffic conditions at that time and the fact that  
4 ROCHA and REYES discussed the specifics of their meeting over WhatsApp, rather than  
5 traditional wire/electronic communications methods, further exacerbated these  
6 surveillance difficulties.

7       283. Later that same day (August 30), at 4:51 p.m., agents intercepted an  
8 incoming call on TT43, Session 127, from Sillas (on TT33). During this call, ROCHA  
9 told Sillas he had already met with REYES (referred to as "the youngster") and REYES  
10 had given ROCHA money. Sillas told ROCHA, "The youngster should have given you  
11 thirty-seven. Did he tell you?" ROCHA replied, "He gave me thirty-six, he said." Sillas  
12 asked if REYES had specifically told ROCHA that information and ROCHA replied,  
13 "Yes, he told me that it was thirty-six." ROCHA then checked this information with  
14 Carlos LOPEZ and could be overheard asking, "Thirty-six, he said?" Then ROCHA  
15 continued to speak with Sillas, saying, "Yes, because it was thirty-six, I haven't counted  
16 it, I still need to go count it." Here, I believe ROCHA and Sillas were discussing the  
17 drug money ROCHA and Carlos LOPEZ had just picked up from REYES. From this  
18 conversation, ROCHA could have been referring to either \$3,600 or \$36,000 of cash he  
19 received from REYES. Based on my training and experience, \$3,600 would likely mean  
20 ROCHA had sold 100 grams of heroin to REYES at a price of \$900 per 25-gram  
21 increment; \$36,000 would likely mean ROCHA sold REYES a kilogram of high-quality  
22 heroin.

23       284. I believe this "36" refers to \$36,000 for a kilogram of heroin for several  
24 reasons. I do not believe it would take ROCHA and LOPEZ very long to count \$3,600,  
25 yet, by the time of Session 127 (almost an hour after ROCHA and LOPEZ met with  
26 REYES), ROCHA told Sillas he still had to count the money REYES had given him.  
27 This indicates to me there was probably a significant amount of money to be counted  
28 (i.e., \$36,000 rather than \$3,600). The DEA-contracted linguists also told me "El

1 Perraca” (the word ROCHA used in Session 122 to tell UM1862 who he was calling on  
2 behalf of) literally means “bad-ass dog,” and could refer either to someone’s nickname or  
3 to some very high quality drugs. Based on my training and experience, I know the price  
4 of a kilogram of heroin can range anywhere from \$25,000 to almost \$40,000 per  
5 kilogram depending on the quantity of heroin purchased at one time and the quality of the  
6 heroin itself. If “El Perraca” is, in fact, a reference to some “bad-ass” or extremely high-  
7 grade heroin, it is likely to be on the higher end of the pricing spectrum. This would  
8 mean \$36,000 *is* a reasonable price for such a product, particularly if REYES is buying  
9 one kilogram of heroin at a time.

10 285. On the next day (August 31, 2018), the Honorable David W. Christel,  
11 United States Magistrate Judge for the Western District of Washington, authorized the  
12 execution of a delayed-notice search and seizure warrant for drugs, cash, and firearms at  
13 ROCHA’s then-residence in Auburn (31900 104th Avenue Southeast, Unit I-101).  
14 Agents executed this warrant on August 31, 2018, while ROCHA was not at his  
15 residence. Agents recovered 560 grams of suspected marijuana, 41 grams of suspected  
16 crystal methamphetamine, 950 net grams of heroin, an estimated 2,000 to 4,000 pills, and  
17 \$164,116.00 in cash drug proceeds. Due to potential fentanyl contamination with these  
18 drugs, agents did not unwrap or field-test any of these substances. The DEA WRL later  
19 confirmed the net weight of the heroin, and conducted a random, representative sampling  
20 of the pills. In the sample, chemists confirmed the presence of 370 net grams of a  
21 substance containing fentanyl. The word “PERRACA” was written on one of the  
22 packages of heroin agents recovered, the same name ROCHA referenced to REYES in  
23 Session 122 described above.

24 286. On September 12, 2018, the Honorable David W. Christel, United States  
25 District Court Judge for the Western District of Washington, authorized the activation of  
26 real-time tracking of TT49 (REYES). On October 5, 2018, agents set out on surveillance  
27 on REYES in order to identify him as the user of TT49. In the morning of October 5,  
28 2018, real-time tracking data for TT49 placed the device at the Saddlebrook Apartments

1 located at **2136 S 260th St., Des Moines, Washington**. At 3:55 p.m., agents followed  
2 REYES to a restaurant located at 24817 Pacific Highway S. #206 in Kent. Shortly after  
3 REYES entered the restaurant, agents followed him inside and discovered REYES was  
4 an employee at this restaurant. Agents subsequently approached REYES and identified  
5 themselves as police who were looking for a wanted person. REYES provided agents  
6 with his Mexican voting card, which listed his name as "Emmanuel Reyes Perez" and  
7 listed his address as "Loc Charco Largo 81148, Guasave, Sinaloa." Based on this,  
8 physical and electronic surveillance, and the fact that TT49 is subscribed to Emmanuel  
9 REYES, agents believe REYES was indeed the user of TT49. Afterwards, agents were  
10 able to follow REYES back to the Saddlebrook Apartments, **2136 S 260th St., Des**  
11 **Moines, Washington**.

12 287. On October 31, 2018, Sgt. Duane Dobbins observed REYES walk from the  
13 second level of the CC building in the Saddlebrook Apartment complex, near where  
14 apartment 201 is located. On separate occasions, agents were only able to see PEREZ  
15 walk to the CC building of the apartment complex. Agents later obtained information  
16 about the utilities subscribers in Building CC and learned Anayancy Reyes was the  
17 utilities subscriber for Apartment CC-201. Agents believe this is REYES' mother or  
18 older relative based on open source database searches. Based on agents' observations of  
19 REYES appearing to exit the second level of the CC building, in conjunction with the  
20 many other occasions agents have observed REYES at Building CC and the last name of  
21 the person listed on the subpoenaed materials matching REYES last name, I believe  
22 REYES lives in **Apartment CC-201 at 2136 S 260th St., Des Moines, Washington**.

23 288. According to tracker data analysis, HIGUERA, ROCHA, LOPEZ and/or  
24 SARMIENTO have all traveled REYES' place of employment and/or his residence (**2136**  
25 **S 260th St., Des Moines, Washington**), for short visits on numerous occasions  
26 throughout this investigation. Additionally, for the majority of these occasions—during  
27 the authorized period of real-time tracking on TT49—TT49 has been present for each of  
28 these short stay visits. From this, I believe REYES met with members of the CASTRO

1 DTO during these short stay visits at **2136 S 260th St., Apartment CC-201, Des**  
2 **Moines, Washington**, for the purpose of purchasing drugs and/or delivering drug-  
3 proceed to the DTO. For example, on October 19, 2018, at 9:59 p.m., tracking data  
4 showed TV3 stop at REYES' place of employment for a brief visit. During that same  
5 time, real-time tracking data on TT49 showed REYES also present at the restaurant.  
6 Unfortunately, agents have only intercepted REYES one time during the span of our  
7 authorized periods of wire and electronic communications; however, I believe this was  
8 because REYES had been communicating with other members of the CASTRO DTO  
9 through WhatsApp.

10 289. Tracking data for REYES' phone (TT49) also showed he made frequent  
11 trips between his residence and his work location throughout most days—something that  
12 is unusual for a typical cook or restaurant worker. Given CASTRO DTO couriers' short-  
13 duration trips to REYES' work location, I believe this travel pattern indicates REYES is  
14 storing drugs and drug proceeds at his residence in Des Moines and distributing those  
15 drugs from his work location. I believe REYES returns to **2136 S 260th St., Apartment**  
16 **CC-201, Des Moines, Washington**, throughout the day to drop off drug proceeds he has  
17 earned and resupply himself with drugs. This routine travel to **2136 S 260th St.,**  
18 **Apartment CC-201, Des Moines, Washington**, is otherwise very strange and atypical of  
19 someone who works in the restaurant business. It is, however, common among drug  
20 traffickers. They often do not want to travel around with large sums of cash *and* drugs  
21 (or have those two items together in an unsecure location, such as a public place), for fear  
22 of being robbed and losing both their drug product and the cash derived from the sale of  
23 those products in one fell swoop.

24 290. Based on intercepted communications between REYES and the CASTRO  
25 DTO, as well as other intercepted communications between ROCHA and Sillas, coupled  
26 with observations made by agents through physical and electronic surveillance, I believe  
27 REYES is a high-volume heroin distributor. I believe REYES receives kilogram  
28 quantities of heroin and distributes them in smaller increments. I believe he stores his



1 drugs and/or drug proceeds at **2136 S 260th St., Apartment CC-201, Des Moines,**  
2 **Washington** based on the information above.

3 291. REYES has no known criminal history.

4 u) **Location 21.** Residence of Karen SURYAN: **210 NW 107th St.,**  
5 **Seattle, Washington.**

6 292. HSI and DEA Seattle both had separate investigations that involved Karen  
7 and Michael SURYAN for, among other things, drug trafficking. Karen SURYAN  
8 maintains a Washington driver's license in that name, which lists her address as 2548  
9 Northeast 168th Street, Lake Forest Park, Washington. However, based on physical and  
10 electronic surveillance of HEREDIA and Karen SURYAN, agents believe she actually  
11 resides at **210 NW 107th St., Seattle, Washington.** Based on intercepted  
12 communications over HEREDIA's phones, agents believe HEREDIA supplies Karen  
13 SURYAN with drugs and that she is working for her cousin, Michael SURYAN, as a  
14 drug/money courier. Agents initially discovered Karen SURYAN's involvement with the  
15 CASTRO DTO through telephone tolls analysis of TT25 (HEREDIA). Members of HSI  
16 were familiar with Karen SURYAN's phone number (425-770-1067) and recognized it  
17 on HEREDIA's call detail records. Tracking data for HEREDIA's phones (TT25 and  
18 TT46) showed he traveled to **210 NW 107th St., Seattle, Washington,** quite often,  
19 throughout the various periods of real-time tracking of HEREDIA's phones.

20 293. According to real-time tracking on TT25 (HEREDIA), one such trip  
21 occurred on July 27, 2018, and coincided with pen register data on TT25, which showed  
22 communications to and from SURYAN's phone number. Tracking data associated with  
23 TT25 showed the device arrived at **210 NW 107th St., Seattle, Washington,** around  
24 6:00 p.m., and remained there for less than fifteen minutes. According to real-time  
25 tracking of TT25, HEREDIA made another trip to **210 NW 107th St., Seattle,**  
26 **Washington,** on August 8, 2018, which coincided with pen register data on TT25  
27 showing communications to and from SURYAN's phone number. Tracking data  
28 associated with TT25 showed the device arrived at **210 NW 107th St., Seattle,**



1 **Washington**, around 2:15 p.m., and remained there for less than fifteen minutes.  
2 According to real-time tracking of TT25, another of HEREDIA's trips to **210 NW 107th**  
3 **St., Seattle, Washington**, occurred on August 9, 2018, and coincided with pen register  
4 data on TT25 showing communications to and from SURYAN's phone number.  
5 Tracking data associated with TT25 showed the device arrived at **210 NW 107th St.,**  
6 **Seattle, Washington**, around 12:48 p.m., and remained there for less than fifteen  
7 minutes.

8 294. Even without factoring in Seattle traffic, it would take HEREDIA roughly  
9 one hour to travel from the area of his suspected residence (**350 S. Burlington Blvd,**  
10 **Burlington, WA**) to **210 NW 107th St., Seattle, Washington**. HEREDIA has shown a  
11 clear pattern of traveling over an hour to **210 NW 107th St., Seattle, Washington**, only  
12 to remain there for less than fifteen minutes before leaving. This type of short-stay  
13 behavior is consistent with that of drug traffickers, especially considering how far away  
14 HEREDIA and SURYAN live from each other and agents' knowledge of these  
15 individuals' involvement in drug trafficking.

16 295. On September 14, 2018, agents established surveillance at **210 NW 107th**  
17 **St., Seattle, Washington**. Early in the morning, agents intercepted several text messages  
18 between HEREDIA (TT46) and Karen SURYAN, including text messages in which  
19 SURYAN texted HEREDIA "1," and HEREDIA replied, "Ok." At 1:52 p.m., agents  
20 intercepted a call between HEREDIA (TT46) and Karen SURYAN (425-770-1067).  
21 During that conversation, HEREDIA asked SURYAN if she would be ready in five  
22 minutes. SURYAN affirmed and said she would be "here." At 1:57 p.m., agents on  
23 surveillance observed HEREDIA driving his **red Honda Civic bearing Washington**  
24 **license BKS2788** arrive in the neighborhood of **210 NW 107th St., Seattle,**  
25 **Washington**. HEREDIA was at **210 NW 107th St., Seattle, Washington**, for about  
26 three minutes; a mounted surveillance camera at the residence captured him leaving.

27 296. Three days later, on September 17, 2018, (Session 260 on TT46) SURYAN  
28 called HEREDIA and asked him to come over for "one piece," but said if HEREDIA

1 could bring two (for which SURYAN did not have the money), he would not “have to  
2 come out as much.” The two agreed to meet around 7:00 or 7:30 p.m. on that day, but  
3 agents were unable to confirm whether this deal actually occurred.

4 297. Based on tracking data for TT46 and additional intercepted  
5 communications with Michael SURYAN (the suspected user of 206-531-5511 at the  
6 time), agents believe HEREDIA actually met with Michael SURYAN (and possibly  
7 Karen) at their “number two” meeting location, based on the arrangements they made  
8 during Session 269 on TT46. Sessions 292, 296, and 297 over TT46 showed HEREDIA  
9 spoke with Michael and the two met for a suspected drug transaction. Tracking data  
10 associated with TT46 at the time of those communications, showed HEREDIA was near  
11 the intersection of 164<sup>th</sup> St. S. and 36<sup>th</sup> Ave. W. in Lynnwood. Agents believe HEREDIA  
12 and Michael SURYAN conducted their transaction near this intersection.

13 298. Agents did not intercept any additional communications between Karen  
14 SURYAN and HEREDIA on that day, particularly after their agreed-upon meeting time.  
15 Based on training and experience, agents know a drug customer (such as SURYAN)  
16 would contact his/her supplier (such as HEREDIA) if the two had agreed to meet at a  
17 particular time, but the supplier failed to show up. Agents never intercepted any  
18 additional communications between Karen and HEREDIA, and they believe HEREDIA  
19 may have provided Michael with Karen’s drugs at the time of their meeting at the  
20 “number two” spot. Based on agents’ knowledge of the familial relationship between  
21 Michael and Karen SURYAN, agents believe drugs arrived at Karen’s residence on  
22 September 17, 2018, through this meeting at the “number two” location—either through a  
23 subsequent delivery by Michael or because Karen was physically present at the “number  
24 two” meeting. Agents believe Karen SURYAN ultimately brought these drugs and/or the  
25 proceeds from their sale back to her residence at **210 NW 107th St., Seattle,**  
26 **Washington** based on the consistent short-stay traffic they have observed at the residence  
27 over the course of the investigation (which indicates she has at least some of her  
28 customers come directly to her residence for drug transactions) and based on intercepted

1 communications over TT46—or in this instance, the lack of any intercepted complaints  
2 from Karen SURYAN to HEREDIA about not following through on their business  
3 arrangements.

4 299. On September 22, 2018, agents intercepted Session 432 on TT46. During  
5 this call, SURYAN told HEREDIA, “This girl is getting ready to buy some blues,”  
6 maybe in a few days; that she (SURYAN) would like “two pieces” but only had money  
7 for one; and that she (SURYAN) was “out of black.” At the end of the call, SURYAN  
8 summed up by saying, “let me see how much money I got together too, and see what I  
9 want, and ... we go from there.” During this call, SURYAN provided HEREDIA (and  
10 agents) with a variety of information. SURYAN referenced one of her customers (this  
11 girl) who was getting ready to buy an unspecified amount of counterfeit oxycodone pills  
12 from SURYAN. This indicated to agents that SURYAN had purchased these pills from  
13 HEREDIA in the past, since she did not have to explain what she meant to HEREDIA.  
14 When SURYAN told HEREDIA she was “out of black,” she was referring to being out of  
15 heroin based on my training and experience. “Black” is a slang term for heroin,  
16 historically based on the look of black tar heroin (which looks just like its name  
17 suggests). SURYAN also asked for 50 grams of heroin during this call when she asked  
18 for “two pieces.” As noted above, “piece” is a 25-gram increment that usually takes the  
19 place of an ounce. It typically refers to heroin since that drug is distributed using the  
20 metric system. Twenty-five (grams) divides into 1,000 (a kilogram) easily—as opposed  
21 to 28.35 grams in a true ounce.

22 300. In the days that followed, SURYAN pestered HEREDIA for more drugs  
23 and HEREDIA continued to put her off. Finally, HEREDIA used Jose SIERRA to act as  
24 an interpreter/translator between him and SURYAN. During their three-way discussion  
25 on September 27, 2018 (Session 696 over TT46), HEREDIA told SURYAN that she  
26 needed to pay on her drug debt before he could give her any additional drugs. SURYAN  
27 agreed and the two seemingly moved forward with their drug trafficking relationship.  
28 Real-time tracking for HEREDIA’s phones and the surveillance camera footage from

1 SURYAN's residence showed HEREDIA continued to travel to **210 NW 107th St.,**  
2 **Seattle, Washington**, albeit infrequently. Based on the prior intercepted  
3 communications and surveillance observations, agents believe HEREDIA traveled to **210**  
4 **NW 107th St., Seattle, Washington** to conduct additional drug transactions.

5 301. Based on intercepted communications between Karen SURYAN and  
6 HEREDIA, coupled with observations made by agents through physical and electronic  
7 surveillance, I believe Karen SURYAN stores drugs and drug proceeds at **210 NW 107th**  
8 **St., Seattle, Washington**.

9 302. Karen SURYAN's criminal history consists of a 2007 misdemeanor assault  
10 4 conviction (5 days); a 2006 felony conviction for possession of stolen property 1 (20  
11 days jail); and a 1990 felony VUCSA conviction (60 days jail).

12 v) **Location 22. Residence of Michael SURYAN: 16809 8th Ave. SW,**  
13 **Normandy Park, Washington.**

14 303. As referenced above, agents first became aware of Michael SURYAN  
15 through coordination with HSI. Michael SURYAN appears to be a very organized and  
16 meticulous drug trafficker who uses very precise, predetermined coded language.

17 304. For example, at around 3:00 p.m., on August 20, 2018, agents intercepted  
18 an outgoing call on TT25 (Session 11) from HEREDIA to a male using telephone number  
19 206-518-0042. At that time, agents did not know who was using that phone number, but  
20 later determined it was Michael SURYAN. HSI agents provided DEA-contracted  
21 linguists with undercover phone calls they had conducted with SURYAN; linguists used  
22 those calls to conduct a voice comparison. From this voice comparison, DEA-contracted  
23 linguists determined the user of 206-518-0042 was Michael SURYAN. HSI agents told  
24 members of DEA that Michael SURYAN had used a number of phones and phone  
25 numbers throughout the course of their investigation, so they were not surprised to learn  
26 SURYAN had this apparently additional phone he was using to communicate with  
27 HEREDIA. During Session 11, SURYAN asked HEREDIA for "five brown," which I  
28 believe was a coded reference to five pieces of heroin (i.e., 125 grams). HEREDIA

1 affirmed the request and the two agreed to meet, though they did not talk about a specific  
2 location. Agents believed the two had an established meeting location to conduct their  
3 drug transactions, so there was no need for either party to explain *where* to meet on this  
4 occasion.

5 305. An hour after this call, agents intercepted another call on TT25 from  
6 SURYAN (split over Sessions 31 and 32). During this call, Michael SURYAN told  
7 HEREDIA, "I'm here," indicating to agents that SURYAN had arrived at the meeting  
8 location. HEREDIA said he was five minutes away, indicating he was close to the  
9 meeting location. Tracking data for TT25 showed HEREDIA was very close to Spruce  
10 Park in Lynnwood, Washington, during this call; based on other intercepted  
11 communications between HEREDIA and SURYAN, agents believe this is their "number  
12 two" meeting location. Agents believe HEREDIA supplied SURYAN with 125 grams of  
13 heroin during this meeting on August 20, 2018, based on intercepted communications and  
14 their knowledge of HEREDIA and SURYAN's drug trafficking patterns.

15 306. On October 7, 2018, agents intercepted another call (Session 1511) between  
16 Michael SURYAN (now using 206-472-4037) and HEREDIA (TT46). During that call,  
17 SURYAN arranged to meet HEREDIA for "three;" HEREDIA then asked Michael  
18 SURYAN if he wanted to meet at "number two." Michael SURYAN told HEREDIA he  
19 would like to meet at "number three." I believe "number two" and "number three" are  
20 coded references to predetermined meeting locations Michael SURYAN has established  
21 with HEREDIA in order to conceal his movements from law enforcement detection, and  
22 believe Michael SURYAN's request to HEREDIA for "three" was a request for three  
23 pieces (75 grams) of heroin. Subsequently agents later intercepted another call on  
24 October 7, 2018 (Session 1519) between SURYAN and HEREDIA. During that call,  
25 HEREDIA told SURYAN he was at location number three. Simultaneously real time  
26 tracking data for TT46 placed HEREDIA at a public parking lot in Seattle. Agents were  
27 unable to observe this meeting via physical surveillance and technical issues did not  
28

1 allow for real time tracking data of SURYAN's cellular phone (206-472-4073) at this  
2 time.

3 307. In the summer of 2018, HSI had conducted an undercover meeting with  
4 Michael SURYAN. During that meeting, the undercover officer (the UC) asked Michael  
5 SURYAN if he could get drugs. Michael SURYAN was very reluctant to discuss  
6 purchasing drugs with the UC, and stated that he was on federal probation. However,  
7 SURYAN did later tell the UC that the UC was being ripped off when the UC told him  
8 what he/she was paying for methamphetamine. SURYAN said that he paid \$3,200 for 16  
9 ounces of "clear" (crystal methamphetamine), and went on to explain that he had stopped  
10 dealing drugs for a while. According to Michael SURYAN, his Probation Officer told  
11 him to move into a halfway house; SURYAN explained he could not keep drugs there as  
12 he was subject to search as a condition of his probation.

13 308. In July 2018, HSI agents acting in an undercover capacity arranged to meet  
14 Michael SURYAN at a nightclub. During that meeting, Michael SURYAN, unprompted,  
15 offered to contact his "guy" to bring the undercover officers drugs. Later that evening,  
16 SURYAN's "guy" (whose name SURYAN provided to the UC and is known to me but  
17 not included in this Affidavit) arrived with another male, and sold one of the UCs  
18 approximately 5.7 grams of a white crystalline substance that later field-tested positive  
19 for methamphetamine. "The guy" also presented that particular UC with a small bottle  
20 containing a liquid substance that the male described as GHB. Michael SURYAN sat on  
21 the other side of that particular UC and watched the whole transaction, but did not touch  
22 the drugs.

23 309. Also in the summer of 2018, HSI received court authorization to activate  
24 real-time tracking on Michael SURYAN's phone (206-472-4073). Through this tracking  
25 information, agents identified **16809 8th Ave. SW, Normandy Park, Washington**, as  
26 Michael SURYAN's residence. Tracking data for SURYAN's phone consistently placed  
27 it at **16809 8th Ave. SW, Normandy Park, Washington**, in October 2018.  
28 Additionally, on October 31, 2018, TFO Eric Janson observed Michael SURYAN's



1 silver 2000 Toyota Camry bearing Washington license **BKU5269** parked in the  
2 driveway of **16809 8th Ave. SW, Normandy Park, Washington**. Based on the  
3 intercepted communications between Michael SURYAN and HEREDIA, coupled with  
4 information relayed to me by HSI agents and observations made by agents through  
5 physical and electronic surveillance I believe Michael SURYAN stores drugs and drug  
6 proceeds at **16809 8th Ave. SW, Normandy Park, Washington**.

7 310. Michael SURYAN's criminal history consists of a 2014 conviction in this  
8 District for Bank Fraud and Aggravated Identity Theft (65 months' prison, followed by  
9 five years of supervised release), a 2011 VUCSA conviction, a 2009 identity theft 2  
10 conviction, a 2009 conviction for possession of cocaine while on community supervision,  
11 and a 2007 conviction for possession of methamphetamine.

12 w) **Location 23.** Residence of Orlando BARAJAS: **310 N Anacortes St.,**  
13 **Burlington, Washington, and**

14 x) **Location 24.** Business location of Orlando BARAJAS: **Taco El**  
15 **Antojito, 628 E Fairhaven Ave., Burlington, Washington.**

16 311. Agents identified Orlando BARAJAS through physical and electronic  
17 surveillance at **310 N Anacortes St., Burlington, Washington**, his listed WADOL  
18 residence, and identified him as the user of TT54. Agents have intercepted  
19 communications over TT46 (HEREDIA) that involve BARAJAS and his money services  
20 business located inside his store, Taco El Antojito. Based on the content of these  
21 conversations, agents believe BARAJAS wires and otherwise transfers money for the  
22 DTO, through Taco El Antojito.

23 312. For example, on September 14, 2018, at 7:52 p.m., agents intercepted an  
24 outgoing text message (Session 60 over TT46) from HEREDIA to BARAJAS.  
25 HEREDIA told BARAJAS, "Hey, I have 7 invitations." At 8:28 p.m., BARAJAS  
26 (TT54) responded to HEREDIA (Session 62 over TT46) and said, "Call me." At 8:40  
27 p.m., agents intercepted an incoming call (Session 65 over TT46) from BARAJAS  
28 (TT54). During this call, HEREDIA asked to meet BARAJAS to obtain "seven tacos"



1 because he had "seven invitations." I believe HEREDIA's reference to "tacos" was  
2 coded language for names of seven people for BARAJAS to use for transferring  
3 suspected drug proceeds. I further believe HEREDIA's reference to "seven invitations"  
4 was coded language for \$7,000. I know through my training and experience, when drug  
5 traffickers acquire the proceeds from the sales of drugs, they then need to send the  
6 proceeds to higher-ranking members of the DTO. In order to do this without alerting law  
7 enforcement, drug traffickers will move proceeds from one bank account to another by  
8 using fictitious names and lower dollar amounts (e.g., approximately \$1,000 per  
9 transaction). I believe HEREDIA intended to meet with BARAJAS to transfer suspected  
10 drug proceeds to higher-ranking members of the CASTRO DTO.

11 313. On September 15, 2018, agents intercepted two outgoing text messages  
12 (Sessions 133 and 135 over TT46) to BARAJAS (TT54) from HEREDIA (TT46).  
13 Included in these text messages were seven names, which I believe were the "tacos"  
14 HEREDIA spoke of in Session 60. Then, on September 16, 2018, agents intercepted four  
15 incoming text messages (Sessions 225, 227, 229 and 231) from BARAJAS (TT54) to  
16 HEREDIA (TT46), which contained information about money transfers; the next day,  
17 September 17, 2018, agents intercepted three incoming text messages (Sessions 231, 274  
18 and 278) from BARAJAS (TT54) to HEREDIA (TT46), again containing information  
19 about money transfers.

20 314. Each of these seven text messages (Sessions 225, 227, 229, 231, 274, 276  
21 and 278) included the following: a confirmation code referencing a money transfer; an  
22 amount of money transferred; the name of the company utilized for the transfer  
23 (specifically, Bansefi, Elektra or Famsa); and a statement explaining that a transfer had  
24 been completed for each of the seven names HEREDIA sent BARAJAS on September  
25 15, 2018. The total amount of money BARAJAS referenced in the seven text messages  
26 added up to \$126,902.50; however, I believe the currency BARAJAS was referring to  
27 was Mexican Pesos, rather than US dollars.  
28

1           315. Based on my training and experience, I know that banks or services that  
2 provide money transfers, i.e., Bansefi, Elektra and Famsa, have low dollar amount  
3 transfer thresholds. Through my training and experience and my knowledge of the  
4 CASTRO DTO, I know these drug traffickers typically take steps to avoid detection from  
5 law enforcement. Thus, I believe HEREDIA and BARAJAS conducted seven small  
6 money transfers—utilizing the seven names or “invitations”— of between approximately  
7 \$800 and \$1,200 [USD] in effort to avoid detection from law enforcement. I further  
8 believe HEREDIA and BARAJAS transferred suspected drug proceeds to the higher-  
9 ranking members of the CASTRO DTO, who are likely in Mexico, using the names of  
10 individuals who were not physically present in BARAJAS’ store to make the transfers.

11           316. On September 17, 2018 at 7:06 p.m., agents intercepted an incoming call  
12 (Session 280 over TT46) from BARAJAS (TT54) to HEREDIA (TT46). During this  
13 call, BARAJAS (TT54) told HEREDIA, “I sent you everything,” which I believe meant  
14 that BARAJAS sent HEREDIA the information regarding the suspected money transfers  
15 relayed during Sessions 225, 227, 229, 231, 274 and 278. HEREDIA then asked if  
16 “Everything is good?”—indicating HEREDIA’s interest in whether or not the money  
17 transfers had been successful—to which BARAJAS replied “yes.” Unrelated to the  
18 suspected money transfers, BARAJAS asked HEREDIA “Why aren’t you answering?”  
19 BARAJAS then said, “I was about to turn the fucking phone off.” Through my training  
20 and experience, I know drug traffickers stop using their phones and/or communication  
21 devices, if they suspect a law enforcement presence. I believe, since HEREDIA did not  
22 immediately respond to BARAJAS’ text messages (Sessions 225, 227, 229, 231, 274 and  
23 278 over TT46) on September 16 and September 17, 2018, BARAJAS had contemplated  
24 discontinuing the use of his phone out of a concern law enforcement had detected their  
25 illegal activities.

26           317. On September 24, 2018, the Honorable Theresa L. Fricke, United States  
27 Magistrate Judge for the Western District of Washington, authorized the real-time  
28 tracking of TT54. On September 28, 2018, agents identified BARAJAS as the user of

1 TT54 through continued surveillance of common vehicles and individuals observed near  
2 TT54's location. On that day agents initially set out on surveillance near the real time  
3 tracking data for TT54 at **310 N Anacortes St., Burlington, Washington**. Once at the  
4 address, Bremerton Police Department Det. Mike Nelson observed several vehicles  
5 registered to BARAJAS parked near **310 N Anacortes St., Burlington, Washington**,  
6 including a blue 2002 Audi A4 bearing Washington license BAV8551 and a grey 2004  
7 Cadillac Escalade bearing Washington license ABB9030.

8 318. On the same day, agents intercepted a call (Session 762) between  
9 BARAJAS (TT54) and HEREDIA (TT46). During that call, HEREDIA told BARAJAS  
10 that he would come see him so they (HEREDIA and BARAJAS) could work. BARAJAS  
11 agreed to meet and then asked HEREDIA "how much is it." HEREDIA told BARAJAS  
12 "there are for like twelve invitations." Based on my training and experience, I know  
13 members of the CASTRO DTO to use terms such as "invitations," "tickets," and  
14 "receipts" to refer to drug proceeds. Based on this intercepted call, I believe that  
15 HEREDIA was meeting with BARAJAS to give him (BARAJAS) \$12,000.  
16 Subsequently agents set out on surveillance of HEREDIA using real time tracking data  
17 for HEREDIA's phone (TT46). Agents later observed real time tracking data for TT54  
18 (BARAJAS) and TT46 (HEREDIA) put HEREDIA and BARAJAS together near a Fred  
19 Meyer in Burlington, presumably to conduct the transfer. Agents also saw BARAJAS'  
20 **red 2018 Chevy Silverado bearing Washington license C66267L** parked near TT54  
21 (per tracking data).

22 319. Agents maintained physical surveillance on the **red 2018 Chevy Silverado**  
23 **bearing Washington license C66267L**. At 12:36 p.m., TFO Eric Janson observed the  
24 **red 2018 Chevy Silverado bearing Washington license C66267L** parked in front of  
25 **Taco El Antojito, 628 E Fairhaven Ave., Burlington, Washington**. A search of  
26 corporations listed with the Washington Secretary of State listed BARAJAS as the  
27 registered agent for Antojito II, Inc., at **628 E Fairhaven Ave., Burlington,**  
28 **Washington**. Subsequently, based on additional intercepted communications over TT46

1 (HEREDIA), I believe BARAJAS transferred the \$12,000 money to several different  
2 people in Mexico using the names of people who were not present in his store at the time.

3 320. Specifically, BARAJAS began text messaging HEREDIA several names  
4 and confirmation codes for a money transfer system known as Elektra. This system  
5 would allow money to be transferred from person-to-person and withdrawn utilizing a  
6 passcode. At 1:19 p.m., BARAJAS (TT54) texted HEREDIA (Session 789 over TT46)  
7 as follows: "Rodolfo talavera arias sends amanda lopez armenta through elektra the  
8 passcode N246179852 \$16,643.00." Then at 1:42 p.m., BARAJAS (TT54) texted  
9 HEREDIA (Session 797 over TT46) as follows: "Fabian rodarte rubio sends to fernando  
10 noe rubio leyva through Elektra the passcode X2132003978511 \$19,435.50." I believe  
11 both money references are to Mexican Pesos. Based on these intercepted  
12 communications, I believe that BARAJAS is conducting money-laundering operations  
13 for the CASTRO DTO through his business located at **628 E Fairhaven Ave.,**  
14 **Burlington, Washington**, and that evidence of the same will be found at that location.  
15 Furthermore I believe that further evidence of BARAJAS' money laundering operations,  
16 such as transfer paperwork, are also stored at his **310 N Anacortes St., Burlington,**  
17 **Washington**, residence.

18 321. BARAJAS' criminal record consists of an arrest in 2001 by CBP officers in  
19 Blaine, with no disposition listed.

20 y) **Location 25. Residence of Jose VELASCO: 506 Tiger Lane,**  
21 **Burlington, Washington.**

22 322. On September 16, 2018, at 12:29 p.m., agents intercepted an incoming text  
23 message (Session 162 over TT46) to HEREDIA from a male (later identified as Jose  
24 VELASCO through physical and electronic surveillance) using 206-302-8402 (TT55).  
25 VELASCO asked HEREDIA to bring him "the two young ladies." Through my training  
26 and experience, I am aware that "ladies," or references to females, is common drug code  
27 for heroin, and based on my familiarity with the investigation, I believe HEREDIA is a  
28 heroin distributor for the CASTRO DTO. Therefore, I believe that when VELASCO

1 referred to the "two young ladies," VELASCO was referring to a quantity of heroin.  
2 HEREDIA then agreed to meet with VELASCO (Session 164 over TT46). At 3:38 p.m.,  
3 agents intercepted an incoming text message (Session 179 over TT46) from VELASCO  
4 (TT55) to HEREDIA. VELASCO asked HEREDIA, "Are you still at the same place?"  
5 HEREDIA replied, "Yes" (Session 181 over TT46). At 3:47 p.m., agents intercepted an  
6 incoming text message (Session 183 over TT46) in which VELASCO told HEREDIA,  
7 "Ok, I'll stop by in 10."

8 323. I believe VELASCO utilized TT55 to communicate with HEREDIA to  
9 orchestrate a suspected drug transaction. Specifically, I believe VELASCO asked  
10 HEREDIA for two ounces of heroin (or "two young ladies") on September 16, 2018.  
11 Additionally, VELASCO asked HEREDIA, "Are you still at the same place?" indicating  
12 VELASCO's knowledge of HEREDIA's location and the likelihood that VELASCO has  
13 met HEREDIA at this "place" in the past for suspected drug transactions.

14 324. On September 24, 2018, the Honorable Theresa L. Fricke, United States  
15 Magistrate Judge for the Western District of Washington, authorized the real-time  
16 tracking of TT55. On October 1, 2018, agents identified VELASCO as the user of TT55  
17 by observing similar vehicles and individuals seen within the vicinity of TT55's real-time  
18 location data as the device moved about. Agents saw VELASCO driving a **white 2001**  
19 **Nissan Altima bearing Washington license AVW7517** registered to Cleotilde  
20 VELASCO at 1400 N 30th St., Mount Vernon, Washington. Agents then identified  
21 VELASCO by comparing surveillance photographs of VELASCO to his WADOL  
22 photograph listed at the same 1400 N 30th St., Mount Vernon address. Later that day,  
23 TFO Nisco continued to follow VELASCO and monitor the location for TT55 through  
24 real-time tracking as VELASCO returned to **506 Tiger Lane, Burlington, Washington.**  
25 In October 2018, agents observed that tracking data for TT55 consistently placed  
26 VELASCO at **506 Tiger Lane, Burlington, Washington.** Based on intercepted  
27 communications between VELASCO and HEREDIA, coupled with observations made  
28 by agents through physical and electronic surveillance, I believe VELASCO obtains

1 heroin for redistribution from the CASTRO DTO and stores his drugs and drug proceeds  
2 at **506 Tiger Lane, Burlington, Washington.**

3 325. VELASCO has no known criminal history.

4 z) **Location 26.** Residence of Brian LIVELY: **8123 71st Pl. SE,**  
5 **Snohomish, Washington.**

6 326. Agents identified Brian LIVELY in September 2018 as the result of  
7 intercepted text messages and calls between LIVELY, using 425-219-2805 and URIAS  
8 (TT48). Specifically, on September 28, 2018, agents intercepted several text messages  
9 between LIVELY (425-219-2805), who was unidentified at the time, and URIAS (TT48).  
10 During that conversation, LIVELY and URIAS discussed meeting later in the day at a  
11 Denny's for "500." Based on these intercepted messages and my training and  
12 experience, I believe LIVELY had previously met URIAS at the aforementioned Denny's  
13 in the past, likely for the purposes of conducting suspected drug transactions, and that this  
14 meeting would for a 500-pill transaction.

15 327. At 9:00 p.m. on September 28, 2018, agents observed URIAS meet Carlos  
16 LOPEZ in a Walmart parking lot. During that meeting, I observed LOPEZ arrive at the  
17 Walmart and exit TV4 carrying a paper bag. LOPEZ then walked over to TV7, which  
18 was occupied by URIAS. LOPEZ then entered TV7 before exiting less than five minutes  
19 later and returning to TV4. Shortly after, LOPEZ left the Walmart, again in TV4.  
20 Agents then observed, via physical and electronic surveillance, URIAS return to his  
21 residence at **428 105th St. SW, Everett, Washington,** and LOPEZ return to **Soltero's**  
22 **Market Mexican Store, 24202 104th Ave. SE, Unit 104, Kent, Washington.**

23 328. At 10:32 p.m., agents intercepted a call from URIAS (TT48) to LIVELY  
24 (425-219-2805). During that call, URIAS again confirmed the meeting with LIVELY at  
25 the Denny's for "500," in five minutes. Based on URIAS' call volume at this time and  
26 subsequent surveillance, I believe he (URIAS) was arranging to distribute the suspected  
27 drugs, specifically fentanyl pills, he recently received from LOPEZ at the Walmart. At  
28 10:41 p.m., I observed a **silver 2006 BMW bearing Washington license AYY7257**



1 parked at a Denny's in Everett. The silver 2006 BMW bearing Washington license  
2 **AYY7257** is registered to LIVELY at **8123 71st Pl. SE, Snohomish, Washington**. At  
3 10:45 p.m., URIAS pulled into the Denny's in TV7. An unknown male, later identified  
4 as LIVELY, exited the silver 2006 BMW bearing Washington license **AYY7257** and  
5 entered TV7. Less than a minute later, I observed LIVELY exit TV7 and return to the  
6 silver 2006 BMW bearing Washington license **AYY7257**. Kitsap County Sheriff's  
7 Office (KCSO) Detective Cory Manchester later identified LIVELY by comparing the  
8 unknown male driving the silver 2006 BMW bearing Washington license **AYY7257** to  
9 LIVELY's WADOL photograph. After LIVELY returned to the silver 2006 BMW  
10 bearing Washington license **AYY7257**, both he and URIAS (in TV7) left the Denny's.

11 329. In October 2018, agents conducted surveillance at **8123 71st Pl. SE,**  
12 **Snohomish, Washington**. Specifically, on October 31, 2018, KCSO Detective Troy  
13 Graunke observed two vehicles parked in the driveway of **8123 71st Pl. SE, Snohomish,**  
14 **Washington**: a silver 2004 Infiniti bearing Washington license **AKR1965** (registered to  
15 Kim LIVELY at the 8123 71st Pl. SE, Snohomish address and a **black Chevrolet**  
16 **Silverado with no rear license plate**. On November 1, 2018, agents observed the same  
17 two vehicles parked in the driveway of **8123 71st Pl. SE, Snohomish, Washington**. A  
18 check of WADOL records for vehicles registered to LIVELY showed LIVELY had  
19 registered a 2018 Chevrolet Silverado in October 2018, at his **8123 71st Pl. SE,**  
20 **Snohomish, Washington** residence. I believe that the Silverado observed in the  
21 driveway of **8123 71st Pl. SE, Snohomish, Washington** is LIVELY's newly-purchased  
22 vehicle and he has not yet received or placed the license plates on the vehicle. Based on  
23 intercepted communications between LIVELY and URIAS, coupled with observations  
24 made by agents through physical and electronic surveillance, I believe LIVELY obtains  
25 distribution quantities of counterfeit oxycodone pills from the CASTRO DTO and stores  
26 drugs and drug proceeds at **8123 71st Pl. SE, Snohomish, Washington**.

27 330. LIVELY has no known criminal history.  
28

1           **aa) Location 27.** Residence of Uriel ZELAYA: 28527 37th Pl. S, Auburn,  
2           Washington.

3           331. Agents had initially identified Uriel ZELAYA through tolls analysis of  
4           phones used by HEREDIA and ORDONEZ. Agents noticed 206-880-5023 (ZELAYA)  
5           was in contact with these two members of the DTO. Agents subsequently researched the  
6           subscriber information for 206-880-5023; the results showed the phone was subscribed to  
7           a “Jose ZELAYA” at **28527 37th Pl. S, Auburn, Washington**. Agents later identified  
8           Uriel ZELAYA as the user of 206-880-5023, as described below. According to WADOL  
9           records, Jose is Uriel ZELAYA’s middle name. Additionally, agents later confirmed  
10          ZELAYA lives at **28527 37th Pl. S, Auburn, Washington**, the same address listed under  
11          subscriber records for his phone.

12          332. Just before Carlos LOPEZ returned to Washington in late August 2018—  
13          from Louisiana—telephone tolls analysis showed ZELAYA was in contact with a  
14          Louisiana-based phone number subscribed to Carlos LOPEZ. Agents suspected LOPEZ  
15          might soon return to Washington due to this sudden communication spike with  
16          ZELAYA. Agents further believed LOPEZ might have been reaching out to steady  
17          customers of the DTO in order to prepare them for his arrival. Sure enough, LOPEZ  
18          returned to Washington (from Louisiana) soon afterward and began conducting suspected  
19          drug transactions with ZELAYA.

20          333. Agents intercepted ZELAYA over TT51 several times. From these  
21          intercepted communications, agents believe ZELAYA is responsible for coordinating the  
22          delivery of multiple pounds of crystal methamphetamine, over 100 grams of heroin, and  
23          hundreds of pills made with fentanyl. For example, on September 25, 2018, agents  
24          intercepted an outgoing call (session 38 over TT51) from LOPEZ (TT51) to ZELAYA  
25          (206-880-5023). During that call, LOPEZ asked ZELAYA if he needed “half” and  
26          ZELAYA told LOPEZ he was at his house. ZELAYA then asked LOPEZ if he would  
27          like to meet “Guerillo” (the white guy), and LOPEZ stated he would. LOPEZ and  
28          ZELAYA then arranged to meet at ZELAYA’s residence. LOPEZ stated that he would

1 bring "half" and some "buttons" (pills) ZELAYA could check out for free. Real-time  
2 tracking data for TV4 later indicated that LOPEZ stopped at ZELAYA's residence at  
3 **28527 37th Pl. S, Auburn, Washington**, for roughly seven minutes later that day.

4 334. Agents intercepted additional communications between LOPEZ and  
5 ZELAYA and confirmed the two met based on intercepted communications and tracking  
6 data for TT51 and **TV4**. LOPEZ quoted ZELAYA pricing on crystal methamphetamine  
7 in October 2018 (for one-pound, half-pound, quarter-pound, and ounce increments).  
8 ZELAYA was also intercepted asking LOPEZ for 75 to 100 grams of heroin in early  
9 October 2018, and agents were able to watch a 25-gram heroin transaction between the  
10 two on October 11, 2018.

11 335. On October 11, 2018, agents intercepted a series of calls and text messages  
12 between ZELAYA (206-880-5023) and LOPEZ (TT51), during which LOPEZ agreed to  
13 sell ZELAYA "a whole one" of "morena" (Spanish word for dark, a coded reference to  
14 heroin) for "800." They agreed to meet at "405 Central Ave N, Kent, WA 98032" (the El  
15 Sabor Mexican restaurant). Through my training and experience, I believe LOPEZ  
16 specifically agreed to sell ZELAYA an ounce ("a whole one") of heroin ("morena") for  
17 \$800 ("800"). Additionally, through my training and experience, I know the approximate  
18 price range for an ounce of heroin (roughly 25 grams) in this District to be between \$800  
19 and \$1,200.

20 336. At 7:15 p.m., agents intercepted an additional call between LOPEZ and  
21 ZELAYA. LOPEZ told ZELAYA he was five minutes away from the meet location.  
22 Simultaneously, agents observed, through real-time tracking data, **TV4** leave the DTO's  
23 suspected stash house, **22025 100th Ave SE, Kent, Washington**. At 7:20 p.m.,  
24 Bremerton Police Department Det. Mike Nelson observed a **black 1999 Toyota Corolla**  
25 **bearing Washington license AXZ8671** in the parking lot of the restaurant. Det. Nelson  
26 noticed ZELAYA was the driver of the **black 1999 Toyota Corolla bearing**  
27 **Washington license AXZ8671** based on comparing his observations of the driver with  
28 ZELAYA's WADOL photograph. A minute later, agents observed **TV4** pull in and park.

1 next to the **black 1999 Toyota Corolla bearing Washington license AXZ8671.**

2 ZELAYA then exited the Corolla and entered TV4. Bremerton Police Department Sgt.  
3 Billy Renfro then observed TV4 drive to an adjacent lot before ZELAYA exited TV4 and  
4 returned to the **black 1999 Toyota Corolla bearing Washington license AXZ8671.**

5 337. Based on my training and experience and the above-mentioned intercepted  
6 communications, I recognize this short-stay visiting as being consistent with that of a  
7 drug trafficker making a quick drug-related exchange. From this, I believe ZELAYA and  
8 LOPEZ met for the purpose of ZELAYA purchasing 25 grams of heroin from LOPEZ on  
9 October 11, 2018. Based on intercepted communications between ZELAYA and  
10 LOPEZ, coupled with observations made by agents through physical and electronic  
11 surveillance, I further believe ZELAYA stores drugs and drug proceeds at his residence  
12 located at **28527 37th Pl. S, Auburn, Washington.**

13 338. ZELAYA's criminal record includes felony convictions for take motor  
14 vehicle without permission-2 in 2018 and 2015, a felony conviction for residential  
15 burglary and another for attempted residential burglary in 2011, along with gross  
16 misdemeanor convictions for criminal trespass-1 in 2016, theft-3 in 2015, and theft-3 in  
17 2014. ZELAYA's criminal history includes 25 arrests, the most recent of which were in  
18 2017 and 2018, for possession of a stolen vehicle and failure to comply.

19 **bb) Location 28. Residence of Omar VALTIERRA: 16508 SE 147th St.,**  
20 **Renton, Washington.**

21 339. Agents first identified VALTIERRA as a member of the DTO in October  
22 2018 as a result of intercepted calls between LOPEZ (TT51) and VALTIERRA, using  
23 425-628-7212. Specifically, on October 5, 2018, agents intercepted an outgoing call  
24 (Session 1046 over TT51) from LOPEZ to VALTIERRA. During that call, LOPEZ told  
25 VALTIERRA, "I was told you're going to give me a receipt." Based on my training and  
26 experience and my knowledge of this investigation, I know the suspected drug traffickers  
27 in this investigation to utilize references to paper materials (e.g., receipts, documents, or  
28 tickets) as coded language for money. VALTIERRA subsequently confirmed and the

1 two arranged to meet in Renton at around 4:30 p.m. or 5:00 p.m. Shortly after that  
2 conversation VALTIERRA sent LOPEZ, via a text message (Session 1068), an address  
3 of "16430 se 128th st renton." At 5:57 p.m., GPS tracking data for TV4 indicated that  
4 LOPEZ stopped at the meeting location in Renton. Simultaneously Bremerton Police  
5 Department Det. Rodney Rauback observed an unknown male—later identified as  
6 VALTIERRA—driving a **white 2012 Dodge Ram bearing Washington License**  
7 **C50312M**, registered to VALTIERRA at **16508 SE 147th St., Renton, Washington**.  
8 Det. Rauback identified VALTIERRA by comparing his recollection of the unknown  
9 male observed meeting with LOPEZ to VALTIERRA's WADOL photograph.

10 340. On two occasions in October 2018, agents set up surveillance at **16508 SE**  
11 **147th St., Renton, Washington**, in order to verify it as VALTIERRA's residence. On  
12 October 30, 2018, TFO Justin Chohrach observed a black 2013 Chrysler 300 bearing a  
13 Washington license starting with AKG. On October 31, 2018, TFO Anthony Nisco  
14 observed the same **black 2013 Chrysler 300 bearing Washington license AKG4277**  
15 parked in front of **16508 SE 147th St., Renton, Washington**. This Chrysler 300 is  
16 registered to Omar and Nayeli VALTIERRA at **16508 SE 147th St., Renton,**  
17 **Washington**. In November 2018, agent McKenzie saw VALTIERRA's **white 2012**  
18 **Dodge Ram bearing Washington License C50312M** parked at this residence, along  
19 with the Chrysler 300. Furthermore, VALTIERRA's listed WADOL address is **16508**  
20 **SE 147th St., Renton, Washington**.

21 341. Based on the totality of the above, I believe VALTIERRA's primary  
22 residence is **16508 SE 147th St., Renton, Washington**. I further believe VALTIERRA  
23 utilizes **16508 SE 147th St., Renton, Washington** as a place to store his suspected drugs  
24 and/or drug proceeds based on his interactions with LOPEZ on October 5, 2018. During  
25 the interception of communications over LOPEZ's most recent phones (TT51 and TT70),  
26 and throughout the course of this investigation, almost every one of the DTO members  
27 agents have identified changed their phone numbers regularly. Based on the content of  
28 the intercepted communications between LOPEZ and VALTIERRA, agents believe the

1 two are clearly familiar with each other. Agents believe this is because the two have  
2 conducted many transactions together in the past. The fact that VALTIERRA is in  
3 communication with LOPEZ—as opposed to SARMIENTO, FRIAS, or HIGUERA—  
4 indicates that he is a higher-volume drug trafficker. Based on intercepted  
5 communications between Sillas and LOPEZ (and Sillas and ROCHA) agents believe  
6 Sillas does not dispatch LOPEZ out to meet other Mexican DTO members in order to  
7 pick up money from them unless it is a significant amount of money; typically, this  
8 amount has been no less than \$30,000 (e.g., pick-ups from URIAS, and HEREDIA as  
9 confirmed through intercepted communications). I believe this amount of money is  
10 consistent with a trafficker who is moving either kilograms of heroin or thousands of  
11 pills.

12 342. Based on VALTIERRA's choice of meeting location with LOPEZ (which  
13 was very close to VALTIERRA's residence at **16508 SE 147th St., Renton,**  
14 **Washington**) agents believe VALTIERRA had the drug proceeds he delivered to LOPEZ  
15 stored at **16508 SE 147th St., Renton, Washington**. Based on my training and  
16 experience, I believe VALTIERRA is likely storing his drugs at his residence as well. I  
17 know drug traffickers typically store their drugs and drug proceeds in the same location  
18 (whether it is at a stash location or their residences). This makes it easier to distribute  
19 and organize their drugs and drug proceeds, since both items are within close proximity  
20 to each other. Again, since I believe VALTIERRA left **16508 SE 147th St., Renton,**  
21 **Washington**, with drug proceeds and delivered those proceeds to LOPEZ, I believe he  
22 also stores his drugs at this location. Additionally, agents' surveillance and records  
23 checks have not indicated VALTIERRA has any type of storage unit.

24 343. VALTIERRA's criminal history includes a VUCSA felony conviction from  
25 2001 and an arrest related to a VUCSA felony from 2004. VALTIERRA also has two  
26 gross misdemeanor convictions for obstructing a law enforcement officer and theft, from  
27 2000 and 2001, respectively. VALTIERRA also has a class B felony conviction from  
28 1999 for burglary.



1 cc) **Location 29.** Residence of Jerry Austin RODRIGUEZ Jaime: **859 116th**  
2 **St, Tacoma, Washington.**

3 344. As described above in Section V, during a Facebook Messenger  
4 conversation on November 27 and 28, 2017, Castro told RODRIGUEZ ("Jay Jaime") the  
5 "work" was "very slow" and he "needed more people." Agents believe this was Castro's  
6 way of telling RODRIGUEZ that he (RODRIGUEZ) needed to sell more heroin or find  
7 other redistributors to sell more of the DTO's heroin. RODRIGUEZ told Castro, "I have  
8 alot [sic] of customers undee [sic] me." Castro seemed to like RODRIGUEZ's claim of  
9 having many drug customers and then offered to provide RODRIGUEZ with a half-ounce  
10 of heroin on a "front." RODRIGUEZ provided Castro with a phone number (which  
11 corresponds to RODRIGUEZ's listed phone number in Facebook) and sent a picture of  
12 his house and address to Castro. Early estimates were that the Castros provided  
13 RODRIGUEZ with no less than 247 grams of heroin; conversations indicate that  
14 RODRIGUEZ prefers his heroin in the form of "stones," not "powder." As agents  
15 continued to gather Facebook records on the DTO, those additional records showed the  
16 Castros provided RODRIGUEZ with over 1,000 grams of heroin.

17 345. On January 18, 2018, surveillance agents followed DTO courier FRIAS to  
18 10723 59th Ave E, Puyallup, Washington, which WADOL records show is the registered  
19 address for Jerry Austin RODRIGUEZ Jaime. FRIAS was there for about 13 minutes.  
20 On January 25, 2018, surveillance agents again followed FRIAS to the 10723 59th Ave  
21 E, Puyallup, Washington residence, where FRIAS stayed for several minutes.  
22 Surveillance agents saw another short-stay meeting between RODRIGUEZ and FRIAS  
23 on February 1, 2018, this time at the Outlet Collection Mall in Auburn. RODRIGUEZ  
24 arrived for the transaction in his **blue 2004 Volvo S80 bearing Washington license**  
25 **plate BHK8013.**

26 346. On February 14, 2018, at 4:43 p.m., while conducting surveillance on  
27 FRIAS (TV1), I observed FRIAS travel to 10723 59th Ave. E, Puyallup, Washington;  
28 this residence is located at the end of a dead-end street on 59th Ave. E. I was not able to

1 follow TV1 directly to the end of 59th Ave. E due to concerns of RODRIGUEZ or  
2 FRIAS becoming aware of a police presence. Instead, agents utilized real-time tracking  
3 data for TV1 in order to follow FRIAS' whereabouts. Real-time tracking placed FRIAS  
4 at the 10723 59th Ave E, Puyallup, Washington, residence almost immediately after  
5 agents lost sight of TV1. Less than five minutes later, I reacquired visual of TV1 and  
6 observed FRIAS departing the area of 10723 59th Ave. E, Puyallup, Washington.  
7 Through my training and experience, I recognize short-stay visits as a common trait of a  
8 drug trafficker. Based on FRIAS' short stay visit at 10723 59th Ave. E, Puyallup,  
9 Washington, and the aforementioned returned search warrant materials, I believe 10723  
10 59th Ave E, Puyallup, Washington has been utilized to facilitate numerous suspected  
11 drug transactions with RODRIGUEZ. Real-time tracking data for vehicles the driven by  
12 CASTRO DTO couriers indicates that couriers have stopped at the 10723 59th Ave. E,  
13 Puyallup, Washington, residence over 20 times since the start of this investigation.

14 347. In October 2018, agents began to suspect that RODRIGUEZ had moved  
15 from his 10723 59th Ave. E, Puyallup, Washington, residence when couriers for the  
16 CASTRO DTO stopped frequenting it. A WADOL records check for RODRIGUEZ's  
17 **blue 2004 Volvo S80 bearing Washington license plate BHK8013** indicated that the  
18 Volvo was no longer registered at 10723 59th Ave E, Puyallup, Washington, and was  
19 now registered at **859 116th St. S, Tacoma, Washington**. Agents previously observed  
20 RODRIGUEZ using this vehicle during the meeting with FRIAS at the Outlet Collection  
21 Mall on February 1, 2018. Subsequently, agents set up surveillance of **859 116th St. S,**  
22 **Tacoma, Washington**, to verify it as RODRIGUEZ's new residence. In November  
23 2018, agents observed several vehicles registered to RODRIGUEZ parked near **859**  
24 **116th St. S, Tacoma, Washington**, including a 2004 Volvo bearing Washington license  
25 BHK8013, and a 2007 Infiniti G35 bearing Washington license BMS9633. The 2004  
26 Volvo bearing Washington license BHK8013 is currently registered to RODRIGUEZ at  
27 the **859 116th St. S, Tacoma, Washington**, residence and the 2007 Infiniti G35 bearing  
28 Washington license BMS9633 is currently registered to RODRIGUEZ at his previous

1 10723 59th Ave E, Puyallup, Washington, residence. I believe, based on RODRIGUEZ's  
 2 history of working with the CASTRO DTO as detailed in the Facebook records,  
 3 electronic and physical surveillance of him meeting with DTO couriers, and my  
 4 knowledge of the DTO, that RODRIGUEZ is storing drugs and/or drug proceeds at **859**  
 5 **116th St. S, Tacoma, Washington.**

6 348. RODRIGUEZ's criminal history consists of four felonies, including a 2011  
 7 residential burglary (three counts) and theft 1 conviction (22 months prison); a 2018  
 8 gross misdemeanor for unlawful firearm possession 2 (364/355 suspended for 2 years and  
 9 2 years' probation); and a 2014 gross misdemeanor for possession of heroin (364/329  
 10 suspended, but order revoking suspended sentence filed 3/17/17). RODRIGUEZ also has  
 11 multiple DOC violations listed.

12 **dd) Location 30. Residence of Jake WILSON: 7111 193rd St. E,**  
 13 **Spanaway, Washington, and**

14 **ee) Location 31. Residence of Joshua MENDIOLA: a fifth-wheel trailer**  
 15 **parked at 21515 111th Ave. Court E, Graham, Washington.**

16 349. On December 23, 2017, MENDIOLA (using a Facebook account in that  
 17 name) sent a message to the Castro brothers through the Katherine Thomas Facebook  
 18 account that read, "I have been slowing down and laying low hese [sic] last couple days.  
 19 One of my dealers go [sic] caught so been taking it easy ...." Two days after this  
 20 messaging exchange, MENDIOLA sent additional communications that complained  
 21 about the quality of Castro's heroin. MENDIOLA also discussed heroin pricing, and  
 22 used coded language (saying he was "ready for dark"). During physical surveillance of  
 23 DTO courier Jesus SARMIENTO on December 26, 2017, agents saw him travel from the  
 24 DTO stash trailer at **22025 100th Ave. SE, Kent, Washington** to a Taco Bell in  
 25 Puyallup, where he appeared to meet with a male associated with a white sedan. As the  
 26 white sedan pulled out, detectives saw a male in the driver's seat; the vehicle is registered  
 27 to MENDIOLA. Agents followed the sedan to a smoke shop where they compared  
 28

1 observations of the white male driver to MENDIOLA's Facebook photos, making a  
2 positive match.

3 350. On January 3, 2018, agents following DTO courier FRIAS followed him  
4 from a Day's Inn in Federal Way to a Walgreen's in Puyallup. Agents then saw  
5 MENDIOLA's vehicle pull in, but agents did not see FRIAS and MENDIOLA meet. On  
6 January 18, 2018, agents conducting surveillance of FRIAS followed him from **Soltero's**  
7 **Market Mexican Store, 24202 104th Ave. SE, Unit 104, Kent, Washington, to 22025**  
8 **100th Ave. SE, Kent, Washington**, then to a suspected drug deal with RODRIGUEZ.  
9 After that deal ended, agents followed FRIAS to a Chevron in Puyallup where, based on  
10 prior surveillance activities in that area, they believe he met with MENDIOLA (although  
11 they did not see a meeting). Early estimates, based off the Facebook records, were that  
12 the CASTROs provided MENDIOLA with no less than 330 grams of heroin in a month's  
13 time. As agents continued to gather Facebook records through search warrants, their  
14 estimates of MENDIOLA's drug distribution increased substantially. Agents now  
15 estimate that the CASTROs supplied MENDIOLA with no less than 1,100 grams of  
16 heroin between December 2017 and August 2018.

17 351. Joshua Ray MENDIOLA maintains a Washington driver's license in that  
18 name, which lists his address as 10502 141st St. Court East, Puyallup, Washington.  
19 Agents believe MENDIOLA lived with Jake WILSON at **7111 193rd St. E, Spanaway,**  
20 **Washington**, for part of this investigation, based on physical and electronic surveillance  
21 and agents' court-authorized search of Facebook records associated with the CASTRO  
22 DTO.

23 352. Facebook records showed MENDIOLA introduced himself to Juan Castro  
24 as "Jay's friend" on December 2, 2017. Agents initially believed MENDIOLA was  
25 referring to Jerry Austin RODRIGUEZ Jaime (whose Facebook account was "Jay  
26 Jaime") based on MENDIOLA's description of RODRIGUEZ's residence. However,  
27 agents also believe MENDIOLA may have been referring to Jake WILSON in this  
28 message ("Jay" being a nickname for "Jake"), based on other Facebook messages and

1 subsequent physical/electronic surveillance at **7111 193rd St. E, Spanaway,**  
2 **Washington,** WILSON's residence. MENDIOLA also provided Castro with a  
3 description of his vehicle, a white Nissan Maxima, and his address at the time (**7111**  
4 **193rd St. E, Spanaway, WA 98387**). This information coincides with WILSON's  
5 known address based on WADOL records and public records searches.

6 353. Agents watched CASTRO DTO couriers make many short-stay trips out to  
7 **7111 193rd St. E, Spanaway, Washington,** throughout the investigation, using a mix of  
8 physical and electronic surveillance means. From these initial Facebook records, agents  
9 can account for the CASTRO DTO supplying MENDIOLA with no less than 330 grams  
10 of heroin in one month's time, and agents believe these deliveries were made to  
11 WILSON's residence, **7111 193rd St. E, Spanaway, Washington,** based on physical  
12 and electronic surveillance of SARMIENTO and FRIAS during that same time. Agents  
13 believe MENDIOLA and WILSON may have lived together during that time, and  
14 coordinated their drug delivery requests to WILSON's residence. More recently, from  
15 June 15, 2018, to November 6, 2018, TV3 has traveled to WILSON's residence, **7111**  
16 **193rd St. E, Spanaway, Washington,** for suspected drug transactions ten times. I  
17 believe **7111 193rd St. E, Spanaway, Washington** has been used, and continues to be  
18 used, to facilitate drug transactions. In this instance, I believe these drug deliveries have  
19 gone to MENDIOLA and/or WILSON. Based on these transactions, I believe  
20 MENDIOLA and WILSON have stored (and store) drugs and drug proceeds at **7111**  
21 **193rd St. E, Spanaway, Washington.**

22 354. Based on more recent physical surveillance of MENDIOLA, agents believe  
23 MENDIOLA now lives in a fifth-wheel trailer parked at **21515 111th Ave. Court E,**  
24 **Graham, Washington.** Agents have seen MENDIOLA's **1996 white Nissan Maxima**  
25 **bearing Washington license BGR7720** at this residence, regularly, during the early  
26 morning hours. In November 2018, agents physically saw MENDIOLA at **21515 111th**  
27 **Ave. Court E, Graham, Washington.** Agents also spoke with members of the Pierce  
28 County Sheriff's Office (PCSO) in October and November 2018, and learned

1 MENDIOLA has been conducting suspected drug transactions out of his **1996 white**  
2 **Nissan Maxima bearing Washington license BGR7720** at several grocery store parking  
3 lots and other public places in close proximity to **21515 111th Ave. Court E, Graham,**  
4 **Washington.** I believe MENDIOLA is using **21515 111th Ave. Court East, Graham,**  
5 **Washington,** to store drugs and drug proceeds, and meeting customers in his **1996 white**  
6 **Nissan Maxima bearing Washington license BGR7720.** Investigators know, through  
7 searches of CASTRO related Facebook accounts, that MENDIOLA typically purchased  
8 around an ounce of heroin (25 grams) at a time. He also probably lived with Jake  
9 WILSON in the past year. Based on my training and experience, drug dealers at  
10 MENDIOLA's level, who are also unable to maintain permanent residences, do not have  
11 stash houses. They store drugs and proceeds wherever they are living. Agents have seen  
12 MENDIOLA recently at **21515 111th Avenue. Court E, Graham, Washington,** and  
13 have seen his **1996 white Nissan Maxima bearing Washington license BGR7720**  
14 parked there on multiple occasions. I believe MENDIOLA is residing at that location.

15 355. From the physical and electronic surveillance operations conducted  
16 throughout the investigation, as well as agents' review of the data received from several  
17 Facebook search warrants, agents believe MENDIOLA and WILSON are heroin  
18 redistributors for the CASTRO DTO. MENDIOLA's criminal history includes a felony  
19 conviction for Second Degree Robbery in 2014, gross misdemeanor convictions for First  
20 Degree Criminal Trespass in 2015 and 2016, and Making a False Statement to a Public  
21 Servant in 2016, as well as misdemeanor convictions for Second Degree Criminal  
22 Trespass and Fail or Neglect to Apply for a Transfer of Ownership in 2016. Law  
23 enforcement databases show MENDIOLA is suspected of check fraud after depositing an  
24 apparently fraudulent check for \$9,000 at a BECU ATM in October 2017. Following the  
25 deposit and numerous withdrawals from the account over the next week, there was a  
26 negative balance in MENDIOLA's account of \$9,846.74. WILSON's criminal history  
27 includes a felony conviction for Manufacture/Deliver Schedule I/II/III Controlled  
28



1 Substance in 2012, an arrest for Fourth Degree Assault in 2015, and an arrest for Driving  
2 Without a License in 2017.

3 **ff) Location 32. Residence of Alex and David HUBLY: 713 S Yakima**  
4 **Ave., Apartment 9, Tacoma, Washington.**

5 356. Agents initially identified Alex and David HUBLY through their review of  
6 the Castro brothers' "fake" Facebook accounts. The HUBLYs, along with many others  
7 in Washington, were consistently listed as a "friend" on these accounts used by the  
8 Castro s. The HUBLYs' pictures matched their WADOL photographs and  
9 physical/electronic surveillance of SARMIENTO, FRIAS, and HIGUERA showed each  
10 of these couriers made multiple short-stay visits to the HUBLYs' residence.

11 357. On December 14, 2017, Alex HUBLY asked Castro about the "blue pills,"  
12 and if she could have more of those pills from him. Castro said he was sold out but  
13 would have more on "Saturday." Alex HUBLY asked if the pills were "for sure real"  
14 and Castro replied, "llok [sic], this pills are manufactured in clandestine laboratories,  
15 these are not pharmaceutical." Estimates based off the Facebook materials alone showed  
16 the CASTROs provided the HUBLYs with over 1,500 grams of heroin from June 2017 to  
17 August 2018. During the interception of HIGUERA's phone (TT19), it appeared that  
18 Alex HUBLY was continuing to place her drug orders through Facebook, as the  
19 intercepted communications related to the timing of HIGUERA's arrival for drug  
20 deliveries. For example, on July 1, 2018, Alex HUBLY asked HIGUERA, "how far  
21 away are you?" Electronic surveillance showed HIGUERA (in TV3) arrived at the  
22 HUBLY residence for a two-minute visit. Facebook records showed Alex HUBLY's  
23 account was the main account used by the HUBLYs, but those records also showed Alex  
24 made references to David Jozeph HUBLY's involvement (referring to him as "DJ").  
25 Agents on physical surveillance saw David and Alex HUBLY, together, during multiple  
26 interactions with Castro DTO couriers; and they saw David HUBLY meet with  
27 HIGUERA for a suspected drug transaction at the HUBLY residence on at least two  
28 occasions.

1           358. In October 2018, agents, through physical and electronic surveillance,  
2 observed TV3 travel to a location near Yakima Ave. in Tacoma. At that time, agents  
3 were unable to confirm where exactly it stopped. On October 29, 2018, I observed, via  
4 electronic surveillance, TV3 drive to a residence located at **713 S Yakima Ave.,**  
5 **Tacoma, Washington.** TV3 stopped at the residence at 5:52 p.m. and remained there for  
6 about seven minutes before departing. This is just one instance where agents have  
7 observed (through electronic tracking) CASTRO DTO couriers travel to and from **713 S**  
8 **Yakima Ave., Tacoma, Washington.** In September and October of 2018, agents  
9 observed, utilizing real-time tracking data, couriers for the CASTRO DTO stop at **713 S**  
10 **Yakima Ave., Tacoma, Washington,** over twenty five times and conduct short stay  
11 visits. As stated above, I recognize this short stay traffic to be a type of behavior  
12 consistent with behaviors displayed by drug traffickers.

13           359. On October 30, 2018, TFO Anthony Nisco went to the **713 S Yakima**  
14 **Ave., Tacoma, Washington** residence to determine who lived there. While there, TFO  
15 Nisco observed the name "HUBLY" written on a piece of paper affixed to the mailbox of  
16 **Apartment 9.** Additionally, TFO Nisco observed a black 2009 Kia Spectra bearing  
17 Washington license BDF8264 registered to David HUBLY parked in the parking lot  
18 behind the apartment complex near the entrance to **Apartment 9.** Based on my training  
19 and experience, real-time tracking data over TV3, agents' observations and the  
20 conversations obtained from the Facebook search warrant materials, I believe Alex and  
21 David HUBLY are residing at **713 S Yakima Ave., Apartment 9, Tacoma,**  
22 **Washington.** I further believe Alex and David HUBLY are utilizing **7713 S Yakima**  
23 **Ave., Apartment 9, Tacoma, Washington** to aid in the facilitation of their suspected  
24 drug trafficking activities.

25           360. Alex HUBLY has a lengthy criminal history, consisting most notably of  
26 convictions in 2014 for two counts of possession of a controlled substance  
27 (methamphetamine & suboxone), two counts of forgery, and two counts of controlled  
28 substance—false information (attempted to obtain oxycodone) (12 months jail); and in

1 2013 for theft 3 (four days jail). She appears to have been arrested in 2016 on probation  
2 violations, and has a litany of other arrests for which the dispositions are unknown.  
3 David HUBLY's criminal record consists of three arrests in 2008 for driving with a  
4 suspended/revoked license, drug paraphernalia/use, and telephone harassment.

5 **gg) Location 33. Residence of Charles JOSLYN: 8422 214th Ave. E,**  
6 **Bonney Lake, Washington.**

7 361. As described above in Section V, on December 27, 2017, JOSLYN and  
8 Castro initiated their Facebook conversation. The two arranged a drug transaction  
9 (which, according to the Facebook messages, occurred that date at a Target store in  
10 Kent). JOSLYN explained it would be better to do the deal in TV1 because JOSLYN  
11 had brought his children with him and they were in his car already, occupying space.

12 362. On December 31, 2017, JOSLYN contacted Castro through the Katherine  
13 Thomas Facebook account concerning another potential drug transaction. JOSLYN  
14 arranged to purchase 17 grams of heroin for \$300, and Castro agreed to front some of the  
15 heroin to JOSLYN. Castro then established that JOSLYN would owe an additional \$500.  
16 JOSLYN then discussed the potential meeting location. JOSLYN told Castro that he was  
17 in Puyallup, Washington; Castro requested an address and JOSLYN sent 209 21st Ave.  
18 SW, Puyallup, Washington.

19 363. JOSLYN seemed to typically receive 12 to 50 grams of heroin at a time  
20 from Castro, though on December 30, 2017, JOSLYN inquired about pricing on "quarter  
21 pounds" or "100 grams." Castro told JOSLYN it would be \$4,300 and JOSLYN thought  
22 that price was too much. JOSLYN tried to negotiate and bargain Castro down to \$3,600  
23 for 100 grams of heroin. Castro did not respond to those efforts. Agents observed four  
24 scheduled meetings between JOSLYN and the CASTRO DTO couriers, arranged via the  
25 Katherine Thomas Facebook account, from December 2017 to January 2018. As a result  
26 of those four transactions agents estimate JOSLYN purchased 65 grams of high purity  
27 heroin from the DTO.  
28

1        364. Further records analysis identified Apartment N104 as JOSLYN's  
2 apartment at the 209 21st Ave SW, Puyallup, residence. Two vehicles registered to  
3 JOSLYN were listed in WADOL records at 209 21st Ave SW, Apt N104, Puyallup,  
4 Washington: a red 1993 Nissan Maxima bearing Washington license BIP9732 and a  
5 black 1993 Acura Integra bearing Washington license BKB5179.

6        365. In November 2018, agents conducted an undercover purchase of a non-drug  
7 item from JOSLYN, who was advertising the item for sale on a social media marketplace,  
8 in order to confirm his home address. An undercover agent met with JOSLYN at a  
9 McDonald's in Tacoma. JOSLYN drove a red 1991 Ford Ranger bearing Washington  
10 license A13382Y to the McDonald's. Prior to this operation, agents were informed by  
11 local law enforcement that Brittany Stapleton is JOSLYN's girlfriend. This 1991 Ranger  
12 is registered to Brittany Stapleton at **8422 214th Ave. E, Bonney Lake, Washington.**  
13 Additionally Stapleton was observed by the UC riding in the Ranger with JOSLYN  
14 during this meeting. During subsequent surveillance of JOSLYN and the Ranger, agents  
15 observed JOSLYN and Stapleton drive to **8422 214th Ave. E, Bonney Lake,**  
16 **Washington.**

17        366. On November 28, 2018, agents received data from Facebook regarding the  
18 execution of a search warrant on the Tom Ryan account, another account used by the  
19 CASTRO DTO for the sole purpose of conducting drug transactions. JOSLYN is a listed  
20 friend with this account. On November 6, 2018, JOSLYN contacted the CASTRO DTO  
21 via the Tom Ryan account. During that conversation, JOSLYN stated that he had lost all  
22 his big suppliers in the area but that he did not have the money to start out on his own.  
23 JOSLYN went on to state that he is living in "Bonney lake at my girl's house." The  
24 CASTRO DTO responded by asking if JOSLYN wanted to start with "half (12g)" and  
25 requested an address from JOSLYN. JOSLYN sent his girlfriend's **8422 214th Ave. E,**  
26 **Bonney Lake, Washington,** address. Later that day, at 11:54 am, GPS tracking data  
27 indicated that TV3 traveled to the **8422 214th Ave. E, Bonney Lake, Washington,**  
28 residence and stopped for less than five minutes. Based on my training and experience,

1 agents' observations, the fact that JOSYLN told Castro he lived at **8422 214th Ave. E,**  
2 **Bonney Lake, Washington**, on November 6, 2018, and a DTO courier's subsequent trip  
3 to that residence, I believe JOSLYN lives at **8422 214th Ave. E, Bonney Lake,**  
4 **Washington**, and is likely storing drugs and drug proceeds at this location.

5 367. JOSLYN's criminal history consists of three felony convictions, two for  
6 unlawful possession of a firearm (2018, 4 months imposed & 2015 (work release)), and  
7 one for burglary 1 (1998, 15 months).

8 **hh) Location 34. Residence of Timmy Jay CRAWFORD: 3435 Auburn**  
9 **Way S, Apartment 38, Auburn, Washington.**

10 368. Timmy Jay CRAWFORD possesses a Washington driver's license in that  
11 name, which lists his address as **3435 Auburn Way S, Apartment 38, Auburn,**  
12 **Washington**. Agents have confirmed this information through physical and electronic  
13 surveillance, as well as a review of subscriber records for CRAWFORD's cellular phone.  
14 Agents initially identified CRAWFORD through their review of the various Facebook  
15 accounts used by the Castro brothers. Agents' subsequent review of returned search  
16 warrant materials from Facebook furthered their beliefs regarding CRAWFORD and his  
17 drug association to the Castros. CRAWFORD was listed as a "friend" on these Facebook  
18 accounts and agents were able to link CRAWFORD's Facebook account with a phone  
19 number subscribed to him, using telephone tolls analysis of SARMIENTO's tolls.  
20 Additionally, all of the CASTRO DTO couriers in Washington have routinely stopped at  
21 **3435 Auburn Way S, Apartment 38, Auburn, Washington**, for short durations  
22 throughout the investigation.

23 369. On December 22, 2017, Castro messaged CRAWFORD (whom he referred  
24 to as "amigo"), but never received a response. Castro called the UC "amigo," and  
25 referred to almost all of his Facebook drug associates as amigos or amigas. During the  
26 interception of HIGUERA's phone (TT19), it appeared that CRAWFORD was  
27 continuing to place his drug orders through Facebook, as the intercepted communications  
28 related to the timing of HIGUERA's arrival for drug deliveries. For example, on July 1,

1 2018, HIGUERA and CRAWFORD exchanged text messages about HIGUERA's  
 2 "ETA." HIGUERA (in TV3) arrived at CRAWFORD's apartment complex (3435  
 3 Auburn Way S, Auburn, Washington) consistent with HIGUERA's estimated arrival  
 4 time.

5 370. CRAWFORD's communication history with the DTO has shown he talks  
 6 with Juan Castro via telephone and Facebook, and also communicates with CASTRO  
 7 DTO couriers when he has their contact information. While CRAWFORD does not  
 8 appear to communicate via Facebook as frequently as other CASTRO DTO  
 9 redistributors, the Facebook interactions agents have found indicate CRAWFORD does  
 10 use telephone communications (both wire and electronic) to talk to other members of the  
 11 DTO, namely CASTRO and his couriers, such as HIGUERA and FRIAS.

12 371. Prior to intercepting communications over one of HIGUERA's phones  
 13 (TT19), agents believed these communications between CRAWFORD and the DTO's  
 14 low-level couriers were likely to finalize drug transaction planning or to help  
 15 CRAWFORD and the DTO's couriers find one another once one or both arrived at a deal  
 16 location. Once agents began intercepting communications over HIGUERA's phone  
 17 (TT19), agents intercepted several text messages between HIGUERA and CRAWFORD.  
 18 For example, on July 1, 2018, from 8:45 p.m. to 9:17 p.m., agents intercepted Sessions  
 19 138, 140, 142, and 144 between CRAWFORD and HIGUERA. Those messages are as  
 20 follows:

- 21 • CRAWFORD: Park next to me my friend and come to my house [8:45
- 22 p.m.]
- 23 • HIGUERA: Ok [8:48 p.m.]
- 24 • CRAWFORD: ETA [9:16 p.m.]
- 25 • HIGUERA: 3 mins [9:17 p.m.]

26 372. At 9:21 p.m., tracking data for TV3 showed HIGUERA arrived at 3435  
 27 Auburn Way South, Apartment 38, Auburn, Washington. HIGUERA stopped at  
 28



1 CRAWFORD's apartment and stayed for around ten minutes. I believe HIGUERA's  
 2 short visit to CRAWFORD was a drug transaction. I believe HIGUERA delivered heroin  
 3 and/or pills to CRAWFORD at **3435 Auburn Way South, Apartment 38, Auburn,**  
 4 **Washington.** I also believe CRAWFORD is storing drugs and drug proceeds at his  
 5 residence, based on physical and electronic surveillance of suspected drug transactions  
 6 such as these. CASTRO DTO couriers have consistently gone to **3435 Auburn Way**  
 7 **South, Apartment 38, Auburn, Washington,** to make their deliveries to CRAWFORD,  
 8 and CRAWFORD always seems to have money readily available at that location.

9 373. After this event, tracking data confirmed CASTRO DTO couriers  
 10 HIGUERA and SARMIENTO traveled (in TV3) to **3435 Auburn Way S, Apartment**  
 11 **38, Auburn, Washington,** at least 47 more times from July 7, 2018, to November 3,  
 12 2018. Agents have also seen SARMIENTO, FRIAS, and HIGUERA travel to **3435**  
 13 **Auburn Way S, Apartment 38, Auburn, Washington,** prior to July 2018, which puts  
 14 his number of suspected drug transactions with the DTO likely close to or in the triple  
 15 digits over the past year. Agents have seen CRAWFORD at **3435 Auburn Way South,**  
 16 **Apartment 38, Auburn, Washington** during the beginning of November 2018, which  
 17 coincides with TV3's recent tracking data.

18 374. CRAWFORD has a lengthy criminal history, consisting most notably of a  
 19 conviction in 2000 for four VUCSA possession with intent charges (6 months jail); in  
 20 2004 for hit & run—attended—property damage (60 months prison); and subsequent  
 21 probation violations/DUI offenses.

22 ii) **Location 35. Residence of Kurtis and Lindsay NEMEYER: 9119 114th**  
 23 **St. E, Puyallup, Washington.**

24 375. Agents initially identified Lindsay and Kurtis NEMEYER through  
 25 Facebook research. Several of Juan Castro's Facebook accounts, including those in the  
 26 names Katherine Thomas, Gina Morris, and Chris Holdford, have all consistently been  
 27 friends with Lindsay and Kurtis NEMEYER's shared Facebook account, using the  
 28 Facebook name "Kurt Lindsay Nemeyer." Agents know it is common for couples to use

1 a joint Facebook account to share online communication information with each other.  
2 Like a joint bank account, a joint social media account allows both members of the  
3 relationship to see all of the activities on the account and freely use the account.  
4 Facebook records also showed the Castros are familiar with Lindsay and Kurtis.

5 376. On June 29, 2018, at 6:11 p.m., agents intercepted Session 44 over TT19  
6 (HIGUERA). In that session, HIGUERA sent a text message to 206-388-8864, a phone  
7 subscribed to Lindsay NEMEYER, and believed to be used by both Kurtis and Lindsay  
8 NEMEYER, based on their criminal histories and surveillance observations. Session 44  
9 read, "This is Carlos. I'll be there at Burlington in 9 mins." At 6:12 p.m., agents  
10 intercepted Session 46 on TT19. This was an incoming text message that read, "Im  
11 here." Tracking data for TV3 showed the vehicle was, in fact, at the Burlington clothing  
12 store at the Auburn Outlet Collection at 6:23 p.m. Agents believed HIGUERA and one  
13 of the NEMEYERs had likely conducted a drug transaction.

14 377. After this suspected transaction, agents intercepted several more text  
15 messages between HIGUERA (TT19) and the NEMEYER phone. In Session 51,  
16 HIGUERA told one of the NEMEYERs, "You only gave me \$245." The unknown  
17 NEMEYER seemed apologetic and claimed it was an honest mistake. The unknown  
18 NEMEYER then sent a message saying he/she would return to the mall to fix the mistake  
19 and give HIGUERA his money. HIGUERA then asked (in Session 57), "Can I see you at  
20 your house instead? I already left from there." Agents intercepted Session 61 over TT19  
21 at 6:40 p.m. This was an incoming text message on TT19, from the NEMEYERs, which  
22 read, "Yes but my kids are there now so not tell [sic] later im [sic] not going there right  
23 now but will be later text me when your [sic] in my area."

24 378. Several hours went by and then agents intercepted additional  
25 communications between the NEMEYERs and HIGUERA. At 9:57 p.m., agents  
26 intercepted an incoming text message on TT19, from the NEMEYERs, which read: "hey  
27 are you not coming to get this cash??" HIGUERA's response was in Sessions 102 and  
28 105, and read, "I did not go. I am at home." Agents intercepted the NEMEYERs'

1 response as Session 107 over TT19, a text that read, "I have been waiting with the cash  
2 ... And I need more ... Tomorrow morning?" According to tracking data for TV3,  
3 HIGUERA did not travel to NEMEYER's residence, **9119 114th St. E, Puyallup,**  
4 **Washington**, on the following day, June 30, 2018. However, TV3 did travel to **9119**  
5 **114th St. E, Puyallup, Washington**, just after 10:00 p.m. on July 1, 2018, according to  
6 tracking data.

7 379. From this series of text messages and tracking data, I believe HIGUERA  
8 delivered drugs to the NEMEYERs on June 29, 2018. I believe the NEMEYERs  
9 underpaid HIGUERA by mistake and then offered to pay what they owed later that same  
10 night. NEMEYER said he/she was "waiting with the cash" at **9119 114th St. E,**  
11 **Puyallup, Washington**, and then asked for more drugs to be delivered to that residence.  
12 From the intercepted communications over TT19, I believe the NEMEYERs store drugs  
13 and drug proceeds at their residence, and conduct drug transactions with HIGUERA at  
14 **9119 114th St. E, Puyallup, Washington**.

15 380. On July 2, 2018, agents were able to physically observe HIGUERA drive to  
16 the NEMEYER residence, **9119 114th St. E, Puyallup, Washington**. At 3:41 p.m. on  
17 that day, TV3 arrived at that residence and stayed for only four minutes. Agents saw a  
18 blue 2006 Ford Escape bearing Washington license AJD1511 parked at the residence at  
19 that time and later found the vehicle was registered to Lindsay NEMEYER. Based on my  
20 training and experience, and the lack of any other identified vehicles registered to  
21 Lindsay NEMEYER, I believe this is likely the vehicle she has used to conduct drug  
22 transactions with the couriers for the CASTRO DTO—particularly those transactions that  
23 take place at locations other than **9119 114th St. E, Puyallup, Washington**.

24 381. On July 10, 2018, agents, again, used the tracking device associated with  
25 TV3 to watch the vehicle travel from HIGUERA's residence in Kent to **9119 114th St.**  
26 **E, Puyallup, Washington**. Tracking data showed TV3 was at the NEMEYERs'  
27 residence for two minutes, similar to the many short-stay visits I have seen HIGUERA  
28 and SARMIENTO (in TV3) make to other suspected heroin redistributors for the DTO,

1 and similar to the length of time it took for the UC's several heroin transactions with  
2 SARMIENTO, FRIAS, and HIGUERA.

3 382. Between just June 4, 2018, and October 31, 2018, tracking data for TV3  
4 has shown the vehicle traveled to **9119 114th St. E, Puyallup, Washington**, about 28  
5 times. HIGUERA, FRIAS, and SARMIENTO's only job while they have separately  
6 been in Washington has been to deliver drugs to local redistributors such as the  
7 NEMEYERs. All of these 28 trips to **9119 114th St. E, Puyallup, Washington**, were of  
8 short durations and I believe all of these trips were suspected drug transactions, based on  
9 intercepted communications, my training and experience, and my knowledge of how this  
10 DTO operates. Agents have confirmed the NEMEYERs are still living at **9119 114th St.**  
11 **E, Puyallup, Washington**, as of November 2018. Agents physically observed Lindsay  
12 NEMEYER's **blue 2006 Ford Escape bearing Washington License AJD1511** parked  
13 at the residence and an agent observed Kurtis NEMEYER exit **9119 114th St. E,**  
14 **Puyallup, Washington**, get into the **blue 2006 Ford Escape bearing Washington**  
15 **License AJD1511**, and drive away.

16 383. Agents received information from their local counterparts about prior  
17 investigations involving both of the NEMEYERs. Those investigations showed both  
18 Lindsay and Kurtis NEMEYER were distributing drugs. Lindsay NEMEYER's criminal  
19 history consists of 2017 convictions for possession of a controlled substance (heroin), and  
20 two counts of identity theft 2 (3 months jail, 12 months community custody). Kurtis  
21 NEMEYER's criminal history shows the same 2017 convictions for controlled substance  
22 possession (though his is listed for methamphetamine) and two counts of identity theft 2  
23 (6 months jail, 12 months community custody). These two were arrested together on the  
24 same day; they were convicted on the same day as well. I believe this is further evidence  
25 of the NEMEYERs' criminal activity as a couple.

26  
27  
28

1           **jj) Location 36. Residence of Natasha DJORDJEVIC: 1001 E 63rd St.,**  
2           **Tacoma, Washington.**

3           384. Agents have identified Natasha DJORDJEVIC as one of the CASTRO  
4 DTO's longest-standing customers. Members of the Bremerton Police Department had  
5 already identified DJORDJEVIC as a suspected heroin distributor for the DTO before  
6 they began working together with DEA. Physical surveillance showed SARMIENTO  
7 traveled to one of DJORDJEVIC's residences in Tacoma throughout the earlier portion of  
8 this investigation. During the course of the investigation, agents believe DJORDJEVIC  
9 moved at least one time, to a different address in Tacoma.

10          385. Tacoma Police Department (TPD) also became aware of DJORDJEVIC  
11 (since she was operating in their jurisdiction) and conducted a separate drug  
12 investigation. During that investigation, TPD discovered that DJORDJEVIC was calling  
13 phone numbers in Mexico and having heroin delivered to her then-residence, 8820  
14 Highland Ave SW, Tacoma, Washington.

15          386. On June 7, 2016, TPD conducted a search warrant on DJORDJEVIC's  
16 prior residence located at 8820 Highland Ave SW, Tacoma, Washington, and her white  
17 1996 Honda Prelude bearing Washington license ART8630. During the execution of that  
18 search warrant, officers seized 42.7 grams of heroin, 21 30 mg OxyContin pills, five  
19 Suboxone strips, and \$2,000 of suspected drug proceeds. During a subsequent interview,  
20 DJORDJEVIC stated that she had been using heroin for eight years and sold heroin to  
21 support her habit. DJORDJEVIC also stated that the \$2,000 was her money she was  
22 planning to use to purchase more drugs. DJORDJEVIC was otherwise uncooperative  
23 with police and did not provide any information about the Castros. DJORDJEVIC was  
24 released at the scene following the execution of this search warrant.

25          387. Since the start of DEA's investigation, DJORDJEVIC has been friends with  
26 many of the Facebook accounts used by the Castro DTO, including the Katherine  
27 Thomas account, the Gina Morris account, the Rudy Jackson account, the Steve Larson  
28 account, the Rebecca Spencer account, and the Alissa Keyser account, but there have

1 | been no communications between DJORDJEVIC and the Castros on any of these  
2 | accounts in the returned materials. However, tracking data for TV3 showed it traveled to  
3 | DJORDJEVIC's current residence, **1001 E 63rd St Tacoma Washington**, for more than  
4 | 20 short-stay trips from October 2017 to November 2018. Agents estimate the Castros  
5 | have supplied DJORDJEVIC with over 1,000 grams of heroin over the entire scope of  
6 | their relationship, based on TPD's investigation, Bremerton's surveillance of  
7 | DJORDEJVIC, and electronic surveillance of TV1 and TV3. Even an extremely  
8 | conservative estimate of the heroin DJORDJEVIC has received from the CASTROs  
9 | would still be over 500 grams, given the length of time she has been in contact with the  
10 | DTO and the frequency with which couriers have visited her residences.

11 |       388. On October 31, 2018, agents set up surveillance to confirm  
12 | DJORDJEVIC's residence at **1001 E 63rd St., Tacoma, Washington**. At 2:47 p.m., HSI  
13 | Special Agent Drew Rodman observed a red 2005 Acura MDX bearing Washington  
14 | license BHC6971, registered to DJORDJEVIC, parked in the driveway of **1001 E 63rd**  
15 | **St., Tacoma, Washington**. Additionally, real-time tracking data for the vehicles the  
16 | CASTRO DTO couriers utilize indicates the couriers have stopped at **1001 E 63rd St.,**  
17 | **Tacoma, Washington**, three times this month, most recently on November 27, 2018.  
18 | Based on my training and experience, I believe **1001 E 63rd St., Tacoma, Washington**,  
19 | to be DJORDJEVIC's primary residence. I further believe, based on her history of  
20 | communication with the CASTRO DTO and subsequent meetings with DTO couriers at  
21 | her home at **1001 E 63rd St., Tacoma, Washington**, DJORDJEVIC stores drugs and  
22 | drug proceeds at this location.

23 |       389. DJORDJEVIC's criminal history includes two controlled substance felony  
24 | convictions (one for manufacture/deliver schedule I/II-narcotic/schedule IV, with the  
25 | listed drug as "oxycodone," and the other for controlled substance possession) in 2017.  
26 | DJORDJEVIC was sentenced to 12 months (and a day) and six months concurrent  
27 | confinement for these convictions. Additionally, DJORDJEVIC's criminal history shows  
28 |



1 arrests for 12 counts of identity theft-2 in 2016, and controlled substance felonies in  
2 2007.

3 **kk) Location 37. Residence of Corey RILEY: 9121 Washington Hwy 162,**  
4 **Puyallup, Washington.**

5 390. Agents initially identified RILEY through the Castros' Rudy Jackson  
6 Facebook account. RILEY was a listed friend on the account and agents were able to  
7 compare his Facebook photographs to RILEY's photograph in the WADOL database.  
8 During a Facebook messaging conversation between the Rudy Jackson account and  
9 Corey RILEY that took place on August 6, 2018, the two agreed to conduct a transaction  
10 at RILEY's residence in Puyallup, Washington. Agents believe RILEY provided Castro  
11 with his home address (using a separate means of communication) and the two agreed to  
12 meet there. However, in the Facebook messaging conversation, Castro sent RILEY a  
13 Google Maps pin with the precise location of a residence in Puyallup—9121 162nd Street  
14 East. Agents believe RILEY actually resides at **9121 Washington Hwy 162**, and Castro  
15 had mistakenly identified RILEY's address based on the similarity between the numbers  
16 and streets.

17 391. On August 6, 2018, at 5:17 p.m., Castro sent RILEY a message which read,  
18 "8 minutes away." At that time, tracking data for TV3 (HIGUERA) showed the vehicle  
19 was in close proximity to the (incorrect) residence Castro provided via Google Maps, on  
20 162nd Street East. About ten minutes later, tracking data for TV3 showed the vehicle  
21 arrived at that residence. Around that same time, Castro tried to contact RILEY via  
22 Facebook messaging and said, "I finding the house ... I driving a white Honda Accord."  
23 Agents believe this was a reference to TV3, because TV3 is a white Honda Accord.  
24 From subsequent messages, agents believed Castro thought HIGUERA was either lost or  
25 at the wrong residence. Castro repeatedly tried to contact RILEY and eventually asked  
26 RILEY for his location. RILEY provided a more thorough description of his physical  
27 address and explained his residence was on **Washington Hwy 162**, not 162nd Street  
28 East.

1        392. After the exchange of those messages, tracking data for **TV3** showed the  
2 vehicle left the (incorrect) residence on 162nd Street and traveled to **9121 Washington**  
3 **Hwy 162, Puyallup, Washington**. From other Facebook messaging conversations  
4 between Castro and RILEY, agents believe RILEY typically receives 25 to 50 grams of  
5 high-purity heroin during each transaction with Castro. Agents believe he received at  
6 least 25 grams on this occasion. Agents reviewed another conversation in the Facebook  
7 messaging records that took place on August 12 and 13, 2018, between RILEY and  
8 Castro. **TV3's** tracking data showed the vehicle traveled to RILEY's residence on  
9 August 13, 2018, and remained there for about three minutes before leaving. This type of  
10 travel pattern is consistent with HIGUERA's other drug deliveries—including those to  
11 the DEA UC.

12        393. Based on the Facebook messaging conversation and **TV3's** tracking data,  
13 agents believe HIGUERA delivered more heroin to RILEY, at **9121 Washington Hwy**  
14 **162, Puyallup, Washington**, on August 13, 2018, and used **TV3** to do so. Tracking data  
15 shows **TV3** traveled to **9121 Washington Hwy 162, Puyallup, Washington**, 35 times  
16 between August 6, 2018, and November 4, 2018. Agents believe each of these instances  
17 was drug-related in nature. More specifically, agents believe **TV3** traveled to **9121**  
18 **Washington Hwy 162, Puyallup, Washington**, to deliver heroin and/or counterfeit  
19 oxycodone pills to RILEY in exchange for money.

20        394. Agents traveled to **9121 Washington Hwy 162, Puyallup, Washington**,  
21 on October 29, 2018, and observed RILEY and a tan 2002 Audi A6 bearing Washington  
22 license BIA2136, registered to RILEY, at the residence. Based on my training and  
23 experience, Facebook records, physical and electronic surveillance, agents believe  
24 RILEY is a redistributor for the CASTRO DTO. As Facebook records and surveillance  
25 has shown with many of the lower-level (but high frequency) DTO redistributors, agents  
26 believe CASTRO DTO couriers like HIGUERA and SARMIENTO have supplied  
27 RILEY with drugs at **9121 Washington Hwy 162, Puyallup, Washington**, and possibly  
28

1 elsewhere on dozens of occasions, bringing the estimated amount of heroin RILEY has  
2 received from the Castro DTO to well over 100 grams.

3 395. RILEY's criminal history includes a controlled substance felony conviction  
4 for possession of oxycodone in 2011, as well as an arrest shortly thereafter (in 2012) for  
5 another controlled substance felony, though no charges were filed on this 2012 arrest.  
6 RILEY's criminal history also includes a conviction for burglary 2 in 2008, and theft 2 in  
7 1996. RILEY has two driving under the influence gross misdemeanor convictions in  
8 2010 as well. RILEY also has two additional controlled substance arrests in 2009.

9 **II) Location 38. Residence of Julia CAMMEL: 7002 224th St. E,**  
10 **Graham, Washington.**

11 396. Following the execution of the Chris Holdford Facebook account search  
12 warrant, agents identified Julia CAMMEL as a "friend" of the account. As noted above,  
13 agents did not receive any messaging data from this account, but did receive other  
14 account information. Agents have identified friends of this account and others used by  
15 the Castros (i.e., the Katherine Thomas, Rudy Jackson, Rebeca Spencer, Gina Morris,  
16 accounts) as local drug redistributors in Western Washington. Agents have reviewed  
17 Facebook communications between Castro and many friends of these subject accounts.  
18 Subsequently, agents have observed, through physical and electronic surveillance,  
19 couriers for the CASTRO DTO travelling to addresses provided by those friends to the  
20 subject accounts and conducting short stay traffic consistent with drug transactions.

21 397. CAMMEL's WADOL listed address is **7002 224th St. E, Graham,**  
22 **Washington.** I have observed, through analysis of real-time tracking data for vehicles  
23 utilized by the CASTRO DTO, that couriers stopped at **7002 224th St E, Graham,**  
24 **Washington,** three times in May 2018 during the time that the Chris Holdford account  
25 was active. Though agents did not receive any stored communications from the Chris  
26 Holdford account, I believe that CAMMEL was likely in direct contact with one of the  
27 couriers for the CASTRO DTO at this time. During the UC's interactions with the  
28 Castros and/or the couriers, agents learned that some of the more trusted local

1 redistributors for the DTO are in direct conversation with couriers and do not always  
2 communicate with the Castros through Facebook.

3 398. A separate DEA investigation in September 2018 identified **7002 224th St.**  
4 **E, Graham, Washington**, as a stash house for another drug distributor in Western  
5 Washington. During that investigation, agents identified Travis Rawlings as a  
6 methamphetamine and heroin distributor who was having packages of methamphetamine  
7 delivered to **7002 224th St. E, Graham, Washington**. FedEx has confirmed that  
8 Rawlings was receiving packages at **7002 224th St. E, Graham, Washington**, and also  
9 mailing packages out to a P.O. Box in San Diego. Julia CAMMEL's Facebook account  
10 is listed under "Julia Lynn Cammel-Rawlings." Under this account, CAMMEL listed her  
11 employment as a caretaker at "My Grandma's House." Based on information gathered  
12 from the separate DEA investigation mentioned above, agents have identified  
13 "Grandma's House" as a storage facility for multiple local drug distributors.  
14 Additionally, a Carrol Lynn Cammel has a listed WADOL address of **7002 224th St.**  
15 **E, Graham, Washington**. Carrol Cammel's criminal history includes a felony  
16 conviction for Violation of the Uniformed Controlled Substances Act for possession with  
17 intent to distribute in 2004.

18 399. Furthermore, a Pierce County Sheriff's Office investigation from 2016 led  
19 to the execution of a search warrant on March 10, 2017 at **7002 224th St. E, Graham,**  
20 **Washington**. Officers recovered a pound of methamphetamine, 3.5 pounds of heroin,  
21 and \$30,000 in drug proceeds, and Carrol Cammel was found to be in possession of a  
22 user amount of drugs. These additional investigations show that **7002 224th St.**  
23 **E, Graham, Washington** has previously been used to store drugs and drug proceeds, and  
24 I believe the tracking data placing CASTRO DTO couriers at **7002 224th St.**  
25 **E, Graham, Washington**, combined with Julia CAMMEL's "friendship" with an  
26 identified Castro Facebook account, shows the residence is still being used for drug  
27 trafficking purposes. Agents believe evidence of CAMMEL's drug trafficking activities  
28

1 and the proceeds thereof will be located inside CAMMEL's home, **7002 224th St.**  
2 **E, Graham, Washington.**

3 400. In November 2018, U.S. Postal Inspector James Kilgallen ran a records  
4 check for Julia CAMMEL. That check of postal records indicated that Julia CAMMEL  
5 received mail at **7002 224th St. E, Graham, Washington**, as recently as August 2018.

6 401. Julia CAMMEL's criminal history consists of a 2012 felony VUCSA  
7 conviction (possession of methamphetamine), gross misdemeanor convictions for escape  
8 3, theft 3, and making a false statement (2 convictions) in 2014, 2013, 2012, and 2011,  
9 respectively, a 2013 misdemeanor conviction for drug paraphernalia/use, and a 2011  
10 misdemeanor conviction for trespass 2.

11 **mm) Location 39. Residence of Blake HYNEK: 1908 92nd Ave. E,**  
12 **Edgewood, Washington.**

13 402. Agents first identified Blake HYNEK as an associate of the CASTRO DTO  
14 following the execution of a search warrant on the Katherine Thomas Facebook account.  
15 The Katherine Thomas account, as previously discussed in this Affidavit, is one of many  
16 accounts that the Castros have used to conduct suspected drug transactions. HYNEK was  
17 friends with both the Katherine Thomas account and the Rebecca Spencer account.  
18 Agents have also seen communications between HYNEK and the Castros over the  
19 Katherine Thomas account. During one specific communication on January 2, 2018,  
20 HYNEK contacted Castro in order to purchase "one." Based on my training and  
21 experience and knowledge of these suspected drug traffickers—specifically, the retail  
22 level redistributors who communicate with Castro over Facebook—I believe HYNEK  
23 was referring to a 25 gram piece (one ounce) of high purity heroin. Castro then  
24 responded by stating the price was \$1,150. HYNEK subsequently renegotiated for 11  
25 grams of suspected heroin for \$500 instead. During this communication, HYNEK also  
26 told Castro he was going to introduce a new client to the DTO. HYNEK told Castro  
27 Megan CHAPMAN was interested in purchasing a piece (or 25 grams of high purity  
28 heroin) a day. Castro then asked if HYNEK was at his house. HYNEK affirmed.

1 HYNEK then attempted to renegotiate for 12 grams for \$500, and stated that Shalesha  
2 (HUDSON) gets her heroin for \$925. Following this statement, Castro told HYNEK the  
3 price was \$1,000 and HUDSON ordered a different quality of heroin that is not 100%  
4 pure. HYNEK subsequently agreed to purchase 11 grams for \$500. This is just one  
5 instance of suspected drug trafficking between HYNEK and the Castros observed over  
6 the Katherine Thomas account.

7 403. Agents saw communications about 13 such meetings arranged over the  
8 Katherine Thomas account between December of 2017 and February 2018, resulting in a  
9 suspected 450 grams of heroin purchased by HYNEK. During those meetings, HYNEK  
10 met with couriers for the CASTRO DTO at public gas stations and at two of his previous  
11 residences: one that was unknown to law enforcement and only referred to as HYNEK's  
12 "house" and another residence located at 22919 112th Pl SE, Kent, Washington.

13 404. HYNEK was also the target of another, independent DEA investigation. In  
14 September 2018, agents arrested HYNEK during a buy-bust operation between a  
15 confidential source and another DTO in Western Washington. During that buy-bust  
16 operation, HYNEK acted as a courier, transporting three-quarters of a pound of  
17 methamphetamine, on behalf of a suspected drug trafficker unknown to agents. During a  
18 post-arrest interview, HYNEK told agents he lives at **1908 92nd Ave. E, Edgewood,**  
19 **Washington.**

20 405. Investigators know through searches of CASTRO DTO-related Facebook  
21 accounts that HYNEK obtains an average of two ounces of high purity heroin from the  
22 CASTRO DTO at a time and that HYNEK had requested deliveries at two separate  
23 residences over a three-month span from December 2017 to February 2018. From  
24 agents' review of the data received from several Facebook search warrants, as well as  
25 information gathered from additional investigations agents believe HYNEK is a heroin  
26 redistributor for the CASTRO DTO. Based on the information gathered from this  
27 separate investigation and HYNEK's previous interactions with the Castros over  
28



1 Facebook, I believe that HYNEK stores drugs and drug proceeds at **1908 92nd Ave. E,**  
2 **Edgewood, Washington.**

3 406. HYNEK's criminal history includes a felony conviction for Theft from  
4 2012, felony arrest for Residential Burglary in 2008, a felony arrest for Robbery in 2008,  
5 a felony conviction for Residential Burglary 2007, and two felony arrests for Controlled  
6 Substance Manufacture Delivery Possession with Intent to distribute from 2011 and  
7 2006.

8 **nn) Location 40. Residence of Larry SWEITZER: 75 Brookdale Lane,**  
9 **Apartment E102, Bremerton, Washington.**

10 407. Agents identified Larry SWEITZER as a redistributor for the CASTRO  
11 DTO following the execution of the Katherine Thomas Facebook account search warrant.  
12 Agents observed multiple conversations between the Castros, using the Katherine  
13 Thomas account and SWEITZER, using his "Larry Sweitzer" Facebook account. To  
14 date, agents have identified eleven Facebook "Subject Accounts" believed to be used by  
15 CASTRO under various aliases, including Katherine Thomas, Rudy Jackson, and Gina  
16 Morris, and obtained search warrants to review their contents. A review of Facebook  
17 records revealed SWEITZER is a "friend" in multiple accounts, primarily to set up drug  
18 deals. Specifically, from March 14, 2018 to March 27, 2018, SWEITZER contacted  
19 Castro seven times through the Gina Morris account. During those conversations,  
20 SWEITZER asked to meet a member of the DTO. Castro confirmed someone would  
21 meet with SWEITZER, and established a public location for the transaction. Prior to  
22 meeting the courier, SWEITZER consistently maintained contact with Castro via the  
23 Gina Morris account and further confirmed the suspected drug-related meeting. Agents  
24 estimate SWEITZER purchased approximately 288 grams of heroin over that 13-day  
25 period.

26 408. Analysis of the Facebook accounts used by the CASTRO DTO has shown  
27 that the CASTRO brothers typically send a "thumbs up" emoticon to their drug associates  
28 following each successful drug transaction. The UC received a "thumbs up" emoticon

1 following each successful controlled purchase from the CASTRO DTO. During the  
2 instances described in the paragraph above, Castro sent a "thumbs up" emoticon,  
3 indicating to agents that SWEITZER had successfully completed a drug transaction with  
4 Castro.

5 409. In addition to the Gina Morris account activity, agents analyzed various  
6 date ranges in the Katherine Thomas account and determined between November 2017  
7 and December 2017, SWEITZER met CASTRO couriers eight times for approximately  
8 79 grams of heroin.

9 410. Search warrants executed on several other accounts used by the Castros,  
10 including the Rudy Jackson and the Steve Larson accounts, indicate that SWEITZER has  
11 maintained his drug trafficking operations with the CASTRO DTO. Information from  
12 these two accounts indicated that SWEITZER met with a courier for the CASTRO DTO  
13 14 times from July 22, 2018 to October 12, 2018. SWEITZER again scheduled to meet  
14 couriers at public locations, and typically ordered an ounce of heroin (25 grams) at a  
15 time. During several conversations between SWEITZER and the CASTRO DTO through  
16 the Steve Larson account on September 11, 2018, September 20, 2018, and September  
17 30, 2018, SWEITZER requested further instructions on where to meet. I know that many  
18 trusted redistributors for the CASTRO DTO are in direct contact with the couriers. I  
19 believe, considering SWEITZER's history of trafficking with the DTO, that couriers  
20 were either contacted by the Castros and instructed to get in touch with SWEITZER,  
21 SWEITZER contacted those couriers directly, or agents were unable to recover the entire  
22 conversation between the DTO and SWEITZER over Facebook regarding these  
23 meetings. Agents estimate that SWEITZER purchased an additional approximately 300  
24 grams of heroin from the CASTRO DTO based on Information gathered from the Rudy  
25 Jackson and Steve Larson accounts.

26 411. WADOL records list SWEITZER's address as **75 Brookdale Lane,**  
27 **Apartment E102, Bremerton, Washington.** On November 7, 2018, agents conducted  
28 surveillance on **75 Brookdale Lane, Apartment E102, Bremerton, Washington.** Upon

1 arriving at the residence, Det. Ejde observed a **blue Ford focus bearing Washington**  
2 **License BER8834**, registered to Nicole Duke at **75 Brookdale Lane, Apartment E102,**  
3 **Bremerton, Washington.** I have observed conversation between SWEITZER and  
4 Castro over the Rudy Jackson Facebook account pertaining to this vehicle. For example,  
5 on July 28, 2018, during a conversation with Castro over the Rudy Jackson Facebook  
6 account concerning the arrangement of a drug transaction, SWEITZER stated he was in a  
7 "**blue Ford focus.**" After this specific conversation, Castro sent SWEITZER a "thumbs  
8 up" icon, indicating a successful drug transaction. This "**blue Ford focus**" is consistent  
9 with the vehicle Det. Ejde observed in front of **75 Brookdale Lane, Apartment E102,**  
10 **Bremerton, Washington.** At 11:15 a.m. on November 7, 2018, Det. Ejde observed  
11 SWEITZER leaving a recessed entryway to **Apartment E102.**

12 412. Based on SWEITZER's previous communications with the CASTRO DTO  
13 over Facebook, I believe SWEITZER is a heroin redistributor for the CASTRO DTO. I  
14 further believe, based on training and experience, that SWEITZER is storing drugs and  
15 drug proceeds at his **75 Brookdale Lane, Apartment E102, Bremerton, Washington**  
16 residence.

17 413. SWEITZER's criminal history consists of two felony VUCSA convictions  
18 (2011 and 2010), a felony theft 1 conviction (2011; 8 months' jail), and ten gross  
19 misdemeanor convictions, including one for a dangerous weapon violation.

20 oo) **Location 41. Storage unit of Gregory WERBER: Unit 248B at 1st**  
21 **Avenue Self Storage, 2400 1st Ave. South, Seattle, Washington.**

22 414. On August 30, 2018, agents intercepted multiple communications between  
23 ROCHA (TT43) and Sillas, and then ROCHA and the user of TT50. Agents did not  
24 know who the user of TT50 was when they first intercepted that number. Agents later  
25 positively identified the user of TT50 as Oscar Humberto CARRILLO Salcedo. From  
26 these intercepted communications and physical/electronic surveillance that followed,  
27 agents believe ROCHA and LOPEZ collected drug money from several of the DTO's  
28 high-volume distributors and associates on August 30, 2018, and then delivered that

1 money to CARRILLO on two separate occasions that same day. Based on this same  
2 information, agents believe ROCHA and Carlos LOPEZ delivered a total of \$140,850 of  
3 drug proceeds to CARRILLO on that day.

4 415. During the first delivery, agents believe ROCHA and LOPEZ delivered  
5 \$106,000 to CARRILLO. After CARRILLO received this money, he conducted several  
6 counter surveillance maneuvers with his vehicle (a rental vehicle) and lost surveillance  
7 agents immediately. When ROCHA and LOPEZ met CARRILLO for the second time (at  
8 a different location from their first meeting), agents noticed CARRILLO had changed  
9 clothing. At that point, agents believed CARRILLO was a trained and experienced  
10 member of the DTO. Based, once again, on intercepted communications and  
11 physical/electronic surveillance, agents believe ROCHA and LOPEZ delivered \$34,850  
12 to CARRILLO on their second meeting of the day (this meeting occurred at the Bellevue  
13 Square Mall).

14 416. Agents used electronic surveillance means to observe another meeting  
15 between CARRILLO (TT50) and Carlos LOPEZ (TT51) on the night of September 18,  
16 2018. On that day, agents monitoring TT50's real-time tracking, noticed the device  
17 traveled from Memphis, Tennessee (where the device was the prior day as well) to  
18 Newark, New Jersey, and then from Newark to Seattle, Washington. Real-time tracking  
19 of TT50 showed CARRILLO landed at SeaTac International Airport at 7:20 p.m. and  
20 then traveled to the rental car section of the airport (arriving there at 8:05 p.m.). Based  
21 on the next day's physical surveillance, agents know CARRILLO rented a black Nissan  
22 sedan from Enterprise during that time. By 8:20 p.m. on September 18, 2018, TT50's  
23 real-time tracking showed CARRILLO was at the "Hotel Interurban" located at 223  
24 Andover Park East, Tukwila, Washington. CARRILLO did not waste much time before  
25 meeting with LOPEZ, as the real-time tracking for TT50 (CARRILLO), TT51 (LOPEZ)  
26 and TV4 (LOPEZ's vehicle) showed they were all at the same location (the Red Robin  
27 restaurant at 17300 Southcenter Parkway, Tukwila) at the same time (8:49 p.m.) on  
28 September 18, 2018. LOPEZ (according to TV4's tracking) only remained there for a

1 few minutes after 8:49 p.m. before leaving and driving back to his residence in Kent.  
2 TT50's real-time tracking indicated CARRILLO had also left the location before 9:00  
3 p.m. and returned to his nearby hotel. Based on agents' previous observations of  
4 ROCHA (with LOPEZ) and CARRILLO, and the intercepted communications between  
5 ROCHA and CARRILLO (TT50) discussed below, I believe Carlos LOPEZ (TT51) and  
6 CARRILLO (TT50) met for just a few minutes on September 18, 2018, in order for  
7 LOPEZ to give CARRILLO drug proceeds. I believe it is CARRILLO's job to transport  
8 those proceeds or see that they are otherwise laundered and received by higher-level  
9 members (including leaders) of the DTO.

10 417. The following morning, September 19, 2018, agents followed CARRILLO  
11 (in his rental vehicle) from his hotel to a FedEx shipping center in Tukwila, Washington.  
12 There, agents watched CARRILLO bring a white FedEx box into the store and ship it.

13 418. Agents continued to follow CARRILLO throughout the day on September  
14 19, 2018 (via physical and electronic surveillance means). They also monitored the  
15 tracking data for TV4 and TT51 (LOPEZ) throughout that day and the pen registers  
16 associated with TT48 (URIAS), TT50 (CARRILLO), and TT51 (LOPEZ). At 2:00 p.m.,  
17 agents saw TV4 (LOPEZ) was traveling north and shortly after that, the pen register data  
18 showed TT51 (LOPEZ) was in communication with TT48 (URIAS). Agents believed  
19 LOPEZ was likely traveling to meet with URIAS based on these communications.

20 419. TV4 (LOPEZ) traveled north of Lynnwood and made several stops  
21 between 3:45 p.m. and 5:15 p.m. Pen register data for TT51 showed LOPEZ was in  
22 contact with URIAS multiple times after LOPEZ's 2:00 p.m. departure from the Kent  
23 area. The pen register data also showed LOPEZ was in contact with Michael SCOTT;  
24 one of the places LOPEZ traveled to between 3:45 p.m. and 5:15 p.m. was **SCOTT's**  
25 **business at 18421 Highway 99, Suite B, Lynnwood, Washington.** Agents believe  
26 LOPEZ met with at least URIAS and SCOTT while he was in the Lynnwood area, based  
27 on the stops LOPEZ made (according to TV4's tracking) and the pen register data.  
28

1           420. After LOPEZ had driven to SCOTT's office, pen register data for TT51  
2 (LOPEZ) showed the device was in contact with TT50 (CARRILLO). Tracking data for  
3 TV4 showed LOPEZ drove directly from his stops in Lynnwood to the Cost Plus World  
4 Market located at 17680 Southcenter Parkway, Tukwila, Washington. LOPEZ arrived in  
5 the parking lot at 6:40 p.m., according to physical and electronic surveillance. LOPEZ  
6 was in contact with CARRILLO (TT50) multiple times throughout his journey from  
7 Lynnwood to Tukwila, according to pen register data. Agents following CARRILLO  
8 watched him drive to the Cost Plus World Market parking lot referenced above, where he  
9 arrived three minutes after LOPEZ. Pen register data showed TT50 (CARRILLO) and  
10 TT51 (LOPEZ) were in contact with each other right up until the time CARRILLO and  
11 LOPEZ physically met.

12           421. Agents watched as LOPEZ got out of TV4 with a black bag, seemingly  
13 once he saw CARRILLO's vehicle park in the parking lot. CARRILLO parked his rental  
14 vehicle and LOPEZ brought the bag over to the driver's side of the vehicle. CARRILLO  
15 put his driver's side window down and LOPEZ gave CARRILLO the black bag through  
16 that window opening. Agents believe this bag contained a large sum of money based on  
17 their previous observations of ROCHA, his associated vehicle and telephone tracking  
18 data, and the interceptions over one of ROCHA's prior phones (TT43) involving SCOTT,  
19 URIAS (TT48), and CARRILLO (TT50). These past interactions, observations and  
20 interceptions involving ROCHA were extremely similar to what agents saw LOPEZ take  
21 part in with the same people (in ROCHA's place), i.e., with URIAS, SCOTT, and  
22 CARRILLO.

23           422. Based on tracking data, LOPEZ drove TV4 directly back to his residence in  
24 Kent. Physical surveillance confirmed CARRILLO drove his rental vehicle back to his  
25 hotel. CARRILLO arrived at the hotel at 6:50 p.m. and took the black bag LOPEZ had  
26 just given him into the hotel.

27           423. Tracking data showed CARRILLO (TT50) had traveled to **1st Avenue**  
28 **Self-Storage** located at **2400 1st Ave. South, Seattle, Washington**, on September 19 and



1 20, 2018. During the first week of October 2018, Special Agent DelVecchio and I visited  
2 this location and obtained records from the business regarding CARRILLO's activities  
3 there. This business is a secured-access facility; this means each tenant has a specific and  
4 unique entry code he/she must enter in order to gain access to the secure storage portion  
5 of the facility. Access records show someone accessed **Unit 248B** on September 19 and  
6 September 20, 2018, at the very same time CARRILLO (TT50) was at the location.  
7 Based on this information alone, I believed CARRILLO accessed **2400 1st Avenue**  
8 **South, Unit 248B, Seattle, Washington**, during his visit to this location. My review of  
9 **Unit 248B's** rental agreement and other records furthered my suspicion.

10 424. My review of **Unit 248B's** rental records showed the unit is a small, 3' x 5'  
11 x 4' unit rented in Gregory WERBER's name, using an address in Tempe, Arizona.  
12 These rental records showed WERBER first began renting **Unit 248B** in February 2018  
13 and has paid cash every month since for this rental. Someone has frequently accessed  
14 **Unit 248B** every month since WERBER began renting it. WERBER's pen-and-ink  
15 signature is not on the rental documentation for **Unit 248B**; the documentation was  
16 signed with an electronic signature instead. This means either WERBER opted not to use  
17 his actual signature or he was not physically present when the account was established.  
18 **Unit 248B** is too small to store a large number of items inside of it, but it is more than  
19 large enough to store a significant quantity of cash—whether permanently or temporarily.

20 425. As noted, CARRILLO visited this location on the two dates in September,  
21 both of which were after he met with LOPEZ for suspected money pickups. Based on  
22 tracking data for TT50 (CARRILLO's phone), TT51 (LOPEZ's phone), and TV4  
23 (LOPEZ's vehicle), agents believe CARRILLO met with LOPEZ on September 18, 2018,  
24 after CARRILLO landed in Seattle. CARRILLO visited **2400 1st Ave. South, Seattle,**  
25 **Washington**, the following morning (September 19, 2018) and, based on storage access  
26 records, I believe he accessed **Unit 248B**. Based on physical and electronic surveillance,  
27 agents know CARRILLO and LOPEZ met on the evening of September 19, 2018, and  
28 LOPEZ gave CARRILLO a large black bag of suspected drug money. Based on physical

1 and electronic surveillance, CARRILLO visited **2400 1st Ave. South, Seattle,**  
2 **Washington**, the following day and, based on storage access records, I believe he  
3 accessed **Unit 248B** once again. Agents believe both of these visits to WERBER's  
4 Seattle-based storage unit, **2400 1st Ave. South, Unit 248B, Seattle, Washington**, were  
5 related to these drug money pickups with LOPEZ.

6 426. On October 18, 2018, agents initiated the court-authorized interception of  
7 wire and electronic communications over Oscar CARRILLO's phone (TT62). In  
8 intercepted communications over TT62 on October 20, 2018, CARRILLO arranged to  
9 meet a suspected drug trafficker in Western Washington the following day (October 21,  
10 2018) for a money pickup. This person was later identified as Edgar CABRERA.

11 427. At 8:31 a.m., on October 21, 2018, agents intercepted an incoming call  
12 (Session 81) on TT62 from LOPEZ (TT70). During this call, LOPEZ told CARRILLO  
13 he would be done running "errands" in about 20 minutes (likely referring to picking up  
14 drug money based on the history of interactions between LOPEZ and CARRILLO and  
15 ROCHA and CARRILLO), and could go to CARRILLO's location after that.  
16 CARRILLO told LOPEZ, "All right ... I'll send you the address." A few minutes after  
17 this call, agents intercepted Session 83 on TT62, an outgoing text message to TT70,  
18 which read, "1214 harrison street, 98109." Based on this series of communications,  
19 agents believed LOPEZ and CARRILLO would likely meet at or near 1214 Harrison  
20 Street in Seattle, Washington, close to the apartment building where CARRILLO was  
21 staying at the time.

22 428. Ultimately, CARRILLO ended up meeting with CABRERA first on  
23 October 21, 2018, and then with LOPEZ. Agents watched CABRERA give CARRILLO  
24 a weighted, white bag during their brief meeting. CARRILLO brought that bag back into  
25 the Chroma Apartments. After that meeting, agents intercepted Session 101 on TT62.  
26 This was an outgoing text message from CARRILLO to LOPEZ (TT70), which read,  
27 "What's up Gordo [fat man], how's it going [?]" LOPEZ replied in Session 103 on  
28 TT62, "I'll be there in 30 min." Agents intercepted Session 103 at 9:39 a.m. LOPEZ did

1 not arrive at CARRILLO's location until 10:34 a.m. LOPEZ's timing estimation in  
2 Session 103 was slightly off, though LOPEZ (TT70) did call CARRILLO back at 10:35  
3 a.m. (Session 108 on TT62) to let CARRILLO know he was very close to the location  
4 CARRILLO had sent him via text message.

5 429. At 10:35 a.m., agents saw CARRILLO walk out of the Chroma  
6 Apartments. CARRILLO was empty-handed when he walked out of the building.  
7 CARRILLO saw LOPEZ's vehicle (TV4) on the street; CARRILLO got in as the front  
8 passenger. LOPEZ drove TV4 a short distance away from the Chroma Apartments  
9 before he stopped to let CARRILLO out of the vehicle. CARRILLO was carrying a  
10 green duffel bag when he got out of TV4. Agents estimated the bag weighed around 30  
11 pounds based on its size and the way CARRILLO seemed to strain while carrying it.  
12 LOPEZ left the area in TV4 and CARRILLO brought the bag back into the apartment  
13 building.

14 430. Twenty minutes after this meeting, CARRILLO left the apartment building  
15 and drove to **1st Avenue Self-Storage, 2400 1st Ave. South, Seattle, Washington**. Five  
16 days earlier, on October 16, 2018, agents executed a delayed-notice search warrant at **1st**  
17 **Avenue Self-Storage, 2400 1st Ave. South, Seattle, Washington**, specifically on **Unit**  
18 **248B**. The only items in the storage unit at the time of agents' search were FedEx  
19 packaging materials, a large white plastic bag with the FedEx logo on it, and a money  
20 counter. The money counter was in the large white plastic bag when agents found it.  
21 Agents photographed all of the items in the storage unit during their search and then put  
22 all of those items back just as they had found them, so as not to alert CARRILLO or  
23 WERBER.

24 431. CARRILLO was at the storage facility for around ten minutes on October  
25 21, 2018. When he left, agents saw him carrying the same, large, white FedEx plastic  
26 bag that had contained the money counter when agents conducted their court-authorized  
27 search of **Unit 248B** less than a week before. Agents noticed the bag appeared to be  
28

1 weighted; CARRILLO loaded the bag into the trunk of his rental vehicle and drove back  
2 to the Chroma Apartments.

3 432. Agents believe CARRILLO traveled to **Unit 248B** on October 21, 2018, to  
4 retrieve the money counter and bring it back to the apartment he was using in Seattle, in  
5 order to count the drug money he received from LOPEZ (TT70) and CABRERA earlier  
6 that morning. Agents believe CARRILLO and WERBER are using **Unit 248B** to  
7 facilitate their money transportation and money laundering activities for the CASTRO  
8 DTO and others, based on physical and electronic surveillance, intercepted  
9 communications, and agents' prior execution of a delayed-notice search warrant at this  
10 very storage unit. Agents believe a subsequent search of this unit may yield additional  
11 evidence, including the same money counter.

12 **pp) Location 42. Residence of Frances and Agustin JUAREZ Castillo:**  
13 **20707 106th Pl. SE, Kent, Washington**

14 433. On multiple occasions throughout the course of this investigation, agents  
15 have observed couriers for the CASTRO DTO traveling to and from **20707 106th Pl. SE,**  
16 **Kent, Washington,** following drug transactions. Specifically on July 13, 2018, agents  
17 were intercepting communications over TT24 (ROCHA), while other agents  
18 simultaneously conducted physical surveillance of ROCHA. ROCHA (in TV5) left his  
19 residence in Auburn shortly before 4:00 p.m. At 4:09 p.m., ROCHA arrived at the  
20 Auburn Outlet Collections mall and parked near the Burlington Coat Factory. ROCHA  
21 moved his position in the parking lot several times before he stopped near a black Dodge  
22 Ram bearing Arizona license BRX8985, registered to EAN Holdings LLC (i.e., an  
23 Enterprise rental vehicle).

24 434. TV5 and this Dodge Ram drove in tandem, away from the Burlington Coat  
25 Factory, and over to the Wal-Mart at the Auburn Outlet mall. ROCHA and the  
26 unidentified Hispanic male (UHM) passenger from the Dodge Ram walked into the Wal-  
27 Mart separately, but came out within less than one minute of each other and were only in  
28 the store for about five minutes. ROCHA returned to TV5 and the UHM went back to

1 the Dodge Ram. The UHM got into the truck bed of the Dodge Ram and began  
2 manipulating the tailgate. At that time, ROCHA was sitting in TV5, waiting. Agents  
3 suspected the UHM was manipulating an access panel to a natural void or hiding place in  
4 the Dodge Ram's tailgate. The UHM spent about two minutes manipulating the tailgate  
5 of the Dodge Ram before he hopped out of the truck bed and got back into the Dodge  
6 Ram as the front passenger. Once the UHM was back in the Dodge Ram, ROCHA drove  
7 TV5 out of its parking spot in the Wal-Mart parking lot; the female driver of the Ram  
8 (identified through rental records as Cindy Lopez) and the UHM followed ROCHA.

9 435. TV5 and the Dodge Ram drove directly to **20707 106th Pl. SE, Kent,**  
10 **Washington**, and arrived at 4:46 p.m. Cindy Lopez backed the Dodge Ram into the  
11 driveway of the residence and ROCHA parked TV5 on the street. 106th Place Southeast  
12 is a small cul-de-sac, so agents were not able to see exactly what ROCHA, Cindy Lopez,  
13 and the UHM were doing. However, within five minutes, TV5 and the Dodge Ram drove  
14 out of 106th Place Southeast and onto the next street over, 105th Place Southeast,  
15 indicating to agents that the exchange was completed. Both vehicles drove north on  
16 105th Place Southeast and then made separate U-turns. ROCHA drove TV5 directly  
17 back to his residence in Auburn and Lopez drove the Dodge Ram to a nearby Mexican  
18 restaurant. Agents determined, through records checks, that the **20707 106th Pl. SE,**  
19 **Kent, Washington**, residence is the residence of Frances and Agustin JUAREZ Castillo.

20 436. This is just one instance where agents observed, through physical and  
21 electronic surveillance, couriers for the CASTRO DTO stopping at **20707 106th Pl. SE,**  
22 **Kent, Washington**. Real-time tracking data for vehicles utilized by couriers for the  
23 DTO indicates that couriers have stopped at **20707 106th Pl. SE, Kent, Washington,**  
24 residence over 300 times since the start of this investigation. On November 9, 2018, Det.  
25 Graunke observed a white 2004 Chevy Express bearing Washington license C27437J  
26 registered to Agustin JUAREZ Castillo parked in the driveway of **20707 106th Pl. SE,**  
27 **Kent, Washington**. I believe, based on observations of agents from physical  
28 surveillance on July 13, 2018, and other dates, and the frequency of stops made by

1 couriers for the CASTRO DTO at **20707 106th Pl. SE, Kent, Washington**, that drugs  
2 and/or drug proceeds are stored at this location.

3 437. Agustin JUAREZ has no known criminal history.

4 **qq) Location 43. Residence of Carlos HERNANDEZ: 521 S Henderson**  
5 **Street, Seattle, Washington.**

6 438. Agents first became aware of a Hispanic male suspected to be Carlos  
7 HERNANDEZ on September 27, 2018, as the result of intercepted calls between URIAS  
8 (TT48) and 253-893-9855. During a call (session 414 over TT48) from HERNANDEZ  
9 (253-893-9855) to URIAS (TT48), URIAS told HERNANDEZ, "I was told that you were  
10 going to give me the paper back and I'm returning that shit to you." From this, I believe  
11 that URIAS had been instructed by his handlers to return some narcotics that he had  
12 previously received from HERNANDEZ ("that shit") and to get his money ("paper")  
13 back. Agents continued to intercept communications between URIAS and  
14 HERNANDEZ regarding scheduling a meeting. During Session 487 over TT48, on  
15 September 28, 2018, URIAS asked HERNANDEZ for an address. HERNANDEZ then  
16 sent URIAS a text message containing the address "9525 14<sup>th</sup> ave S Seattle wa 98108."  
17 This address is a gas station within two miles of **521 S Henderson St., Seattle,**  
18 **Washington.** URIAS then called HERNANDEZ (Session 490 over TT48) and stated he  
19 would be at the meeting location around 1:30 p.m. At approximately 1:15 p.m., URIAS  
20 called HERNANDEZ again and asked him if he was in his truck. HERNANDEZ  
21 affirmed.

22 439. Agents set up physical surveillance in the area of 9525 14th Ave. S, Seattle,  
23 in anticipation of the meeting between URIAS and HERNANDEZ. Subsequently agents  
24 observed URIAS pull into a nearby gas station while driving TV7. Shortly after, URIAS  
25 exited TV7 and entered the passenger side of a **grey 2004 Hummer H2 bearing**  
26 **Washington license ADH9133.** Less than five minutes later URIAS exited the  
27 **Hummer H2** and returned to TV7. As the **grey 2004 Hummer H2 bearing**  
28 **Washington license ADH9133** left the gas station parking lot, I took several



1 photographs of the driver. Based on the comparison of said photographs to Carlos  
2 HERNANDEZ's WADOL photograph, agents believe HERNANDEZ was the driver of  
3 the **grey 2004 Hummer H2 bearing Washington license ADH9133** during this meeting  
4 with URIAS on September 27, 2018.

5 440. Agents believed HERNANDEZ was the user of 253-893-9855 based on  
6 intercepted communications over TT48 in conjunction with that physical and electronic  
7 surveillance described above. Agents then maintained physical surveillance on the **grey**  
8 **2004 Hummer H2 bearing Washington license ADH9133** as it drove to **521 S**  
9 **Henderson S., Seattle, Washington**. According to WADOL records, the **grey 2004**  
10 **Hummer H2 bearing Washington license ADH9133** is registered to Salvador P.  
11 HERNANDEZ, whose listed WADOL address is **521 S Henderson St., Seattle,**  
12 **Washington**. Carlos HERNANDEZ also has a listed WADOL listed address of **521 S**  
13 **Henderson St., Seattle, Washington**.

14 441. This instance of suspected drug trafficking between URIAS and  
15 HERNANDEZ is just one of several interactions between the two that agents have  
16 become aware of through of interceptions over TT48. On October 5, 2018, agents  
17 intercepted a call (Session 1001 over TT48) between URIAS and HERNANDEZ.  
18 During that call, HERNANDEZ arranged to meet URIAS at the same address where they  
19 previously met on September 27, 2018; URIAS also told HERNANDEZ to text him the  
20 address again, "just to make sure." Shortly after that call, agents intercepted a text  
21 message (Session 1004 over TT48) from HERNANDEZ to URIAS stating "9525 14<sup>th</sup> ave  
22 S Seattle wa 98108," the same address at which agents observed the two meeting on  
23 September 27, 2018. HERNANDEZ then called URIAS (Session 1014 over TT48) and  
24 told URIAS he was driving a white Chevy Silverado. HERNANDEZ then asked URIAS  
25 if he (URIAS) wanted to get in and meet with him in the vehicle. Based on the casual  
26 nature of these intercepted communications and URIAS' reference to returning suspected  
27 drugs to HERNANDEZ I believe that HERNANDEZ and URIAS have been conducting  
28 drug transactions for some time.

1           442. Furthermore, I believe that HERNANDEZ is a high-level drug  
2 redistributor who deals at least quarter-pound quantities of heroin or hundreds of pills  
3 when he meets with URIAS. I know URIAS to purchase drugs from other high-level  
4 distributors such as Carlos LOPEZ in pound quantities (of heroin) or the thousands (of  
5 pills), and to redistribute those drugs to others in large quantities.

6           443. Moreover, HERNANDEZ and members of his family have previously been  
7 subject of an HSI narcotics-related investigation. During that investigation, HSI  
8 investigated five members of HERNANDEZ's family for crimes related to drug  
9 trafficking. Based on the above-mentioned intercepted communications, agents'  
10 observations of meetings between URIAS and HERNANDEZ during physical  
11 surveillance, and HSI's independent investigation into the HERNANDEZ family for their  
12 suspected drug trafficking activities, I believe Carlos HERNANDEZ is storing drugs and  
13 drugs proceeds at **521 S Henderson St., Seattle, Washington.**

14           444. Agents' search for Carlos HERNANDEZ's criminal history yielded too  
15 many matched results based on his name and date of birth for agents to determine his  
16 criminal history. Agents also performed similar searches of Carlos' brother (Alejandro)  
17 and father (Salvador)—both of whom were also subjects of the aforementioned HSI  
18 investigation—and those searches also yielded a large number of results. Currently,  
19 agents do not know whether Carlos HERNANDEZ has a criminal history.

20           **rr) Location 44. Residence of Edgar CABRERA: 900 NE 65th St.,**  
21           **Apartment 609, Seattle, Washington.**

22           445. On November 11, 2018, during the early hours of the morning, agents  
23 noticed real-time tracking over TT63 (Martin GONZALEZ's phone) showed  
24 GONZALEZ was traveling westbound from Spokane, Washington. GONZALEZ is a  
25 suspected bulk drug transporter for the DTO, based on intercepted communications with  
26 HEREDIA, physical and electronic surveillance, pen register data, and his arrest on  
27 November 28, 2018, with approximately 15 pounds of heroin hidden in his tractor-trailer.  
28 At 9:59 a.m., TT63's pen register showed TT63 (GONZALEZ) had contacted 206-751-

1 0005 (TT74), a phone believed to be used by Edgar CABRERA. Based on the real-time  
2 tracking of TT63 and the coinciding pen register data at around the same time between  
3 TT63 and TT74, agents anticipated GONZALEZ would likely meet with CABRERA.  
4 Based on real-time tracking of TT74, agents began conducting surveillance in the area of  
5 the apartment complex located at **900 NE 65th Street, Seattle, Washington**,  
6 CABRERA's suspected residence based on prior surveillance observations and tracking  
7 data associated with CABRERA's phone (TT74). Upon arriving at **900 NE 65th Street,**  
8 **Seattle, Washington**, agents saw a **grey Toyota Camry bearing Washington license**  
9 **BKD8497 (TV14)** in space number 56 of the complex's parking garage. Agents had  
10 already observed **TV14** during surveillance of Oscar CARRILLO on October 21, 2018,  
11 during a suspected drug money delivery.

12 446. On November 11, 2018, at 11:15 a.m., agents saw Edgar CABRERA get  
13 into **TV14** and depart the area of **900 NE 65th Street, Seattle, Washington**. Agents  
14 subsequently followed **TV14** while simultaneously using real-time tracking of TT74, and  
15 confirmed the person using TT74 was indeed driving **TV14**. At 11:46 a.m., TT63's pen  
16 register showed TT74 contacted GONZALEZ (TT63) again. At 11:48 a.m., real-time  
17 tracking showed TT63 (GONZALEZ) was located at the North Bend Truck Stop in North  
18 Bend, Washington. At 11:56 a.m., pen register data showed TT74, again, contacted  
19 GONZALEZ (TT63).

20 447. At 12:03 p.m., agents observed **TV14** arrive at the North Bend Truck Stop,  
21 get fuel, and park in between the Shell gas station and restaurants at the truck stop.  
22 Moments later, agents saw GONZALEZ walk from a tractor-trailer displaying Arizona  
23 license plate AH87591 (the same tractor-trailer agents saw during GONZALEZ's  
24 suspected drug delivery to HEREDIA on September 20, 2018). GONZALEZ was  
25 carrying a grey-colored 5-gallon bucket—which appeared to be heavily weighted due to  
26 the way GONZALEZ was carrying it (dropping his shoulder to one side and heaving the  
27 bucket with his leg on occasion while he walked)—as he walked over to **TV14**.  
28

1        448. At 12:07 p.m., agents saw CABRERA and GONZALEZ meet at the trunk  
2 of TV14, where GONZALEZ heaved the 5-gallon bucket into the trunk. CABRERA  
3 gave a medium-sized red bag and a paint sprayer to GONZALEZ (which he took from  
4 the trunk of TV14), walked back to his tractor-trailer. Two minutes later, CABRERA  
5 left the truck stop parking lot in TV14. Agents then watched GONZALEZ access the  
6 engine compartment of his tractor-trailer and deliberately place the red bag somewhere  
7 inside the engine compartment. Agents suspect GONZALEZ has a hidden compartment  
8 somewhere in his tractor-trailer based on these observations. In addition, agents noticed  
9 GONZALEZ's tractor-trailer was the only truck that parked in the opposite manner from  
10 the rest of the trucks in the parking lot. All of the other trucks were backed-in to their  
11 parking stalls; GONZALEZ parked his the opposite way, which would keep any of his  
12 activities at the front of his vehicle out of view. At 12:18 p.m., agents watched  
13 GONZALEZ get inside his tractor-trailer and depart the truck stop. GONZALEZ drove  
14 east on I-90, back in the direction he had come from, indicating this visit to North Bend  
15 was not related to any type of legitimate product delivery, pickup, or service stop.

16        449. After watching GONZALEZ leave the truck stop, agents conducting  
17 surveillance followed TV14 back to **900 NE 65th Street, Seattle, Washington**.  
18 CABRERA drove all the way to his apartment complex, but pulled TV14 over to the side  
19 of the street, just before his apartment complex. Agents believe this was CABRERA's  
20 attempt to detect police surveillance or anyone who may have been following him, since  
21 NE 66th Street in Seattle is a small roadway. After he pulled to the side of the road and  
22 stopped for about two minutes, CABRERA drove TV14 into the gated garage area of **900**  
23 **NE 65th Street, Seattle, Washington**. Special Agent DelVecchio, on foot, followed  
24 TV14 into the garage and saw CABRERA retrieve the same grey colored 5-gallon bucket  
25 GONZALEZ gave him from TV14. Judging by the way that CABRERA lifted the  
26 bucket out of the vehicle, Special Agent DelVecchio estimated it probably weighed  
27 around 40 pounds. CABRERA entered the apartment complex, but Special Agent  
28 DelVecchio was not able to follow him at that time.

1           450. Minutes later, agents observed a small U-Haul truck arrive at garage  
2 entrance of **900 NE 65th Street, Seattle, Washington**. The U-Haul attempted to pull  
3 into the garage, but then backed out. The U-Haul truck pulled to the side of the road,  
4 near the garage entrance, and double-parked. Shortly after the U-Haul truck had parked,  
5 agents saw CABRERA exit the apartment building and meet with the occupants of the U-  
6 Haul truck. At that point, Special Agent DelVecchio was able to see the U-Haul was full  
7 of belongings such as boxes and furniture items—indicating the occupants of the U-Haul  
8 truck were likely moving into **900 NE 65th Street, Seattle, Washington**. CABRERA  
9 and the occupants of the U-Haul truck seemed to be discussing the logistics of moving  
10 some of the larger objects into the apartment building. Special Agent DelVecchio then  
11 approached CABRERA and the occupants of the U-Haul and offered to help them move  
12 their belongings into their apartment, which they accepted.

13           451. Special Agent DelVecchio moved some of the belongings out of the truck  
14 with CABRERA. CABRERA did not speak much English, but was able to convey  
15 simple instructions to Agent DelVecchio. Agent DelVecchio, CABRERA, and the other  
16 two individuals took several items up to the sixth floor of the apartment building, on the  
17 south side of the complex. When the group arrived on the sixth floor, CABRERA  
18 removed a set of keys from his pocket and handed them to Agent DelVecchio, indicating  
19 for Agent DelVecchio to pass the keys to the other Hispanic male. Agent DelVecchio  
20 could see a Toyota key on the key ring and recognized it as the same set of keys (with the  
21 elevator access fob) he had previously seen CABRERA use to access the elevators. The  
22 other Hispanic male used the key to open **Apartment 609**. Special Agent DelVecchio  
23 helped CABRERA and his associates move these large furniture items into **Apartment**  
24 **609** and saw the same grey colored 5-gallon bucket he and other agents observed  
25 GONZALEZ giving to CABRERA at the truck stop at the entrance. The bucket was in  
26 the main hallway of **Apartment 609**.

27           452. After helping CABRERA, the unidentified female, and unidentified male  
28 move some of their belongings into the apartment, Special Agent DelVecchio introduced

1 himself and bid them farewell. The person seen driving TV14 and meeting with  
2 GONZALEZ earlier that same day introduced himself as "Edgar." Of note, the listed  
3 subscriber for 206-751-0005 (TT74) is "Edgar Cabrera." From this and the fact that the  
4 driver of TV14 told Special Agent DelVecchio that his name is "Edgar," agents believe  
5 Edgar's full name to be Edgar CABRERA.

6 453. Agents believe CABRERA is a high-volume drug distributor for the DTO,  
7 and that he stores drugs and drug-proceeds at **900 NE 65th Street, Apartment 609,**  
8 **Seattle, Washington**, based on agents' training and experience and observations on  
9 November 11, 2018.

10 454. Currently, agents do not know CABRERA's criminal history. They do not  
11 know CABRERA's true date of birth at this time, which makes narrowing their search for  
12 his potential criminal record very difficult. There are too many individuals named  
13 "Edgar Cabrera" listed in criminal database records for agents to determine if the  
14 CABRERA they are investigating is one of those people and has a criminal history.

15 ss) **Location 45.** Residence of Constantino MARES Garcia: **1312 80th Ave**  
16 **SE, Lake Stevens, Washington.**

17 455. On November 3, 2018, at 5:34 p.m., agents intercepted an outgoing call  
18 (Session 24 over TT62) from CARRILLO to a male later identified as Constantino  
19 MARES using 206-249-5690 (TT76). During this call, CARRILLO and MARES agreed  
20 to meet on November 4, 2018, so CARRILLO could pick up "some documents" (i.e.,  
21 bulk cash/drug proceeds) from MARES. Immediately after this call, CARRILLO sent  
22 MARES (TT76) a text message that included an address of "1214 harrison street, 98109,"  
23 the same address he sent CABRERA on October 21, 2018, so CABRERA could meet  
24 CARRILLO to give him (CARRILLO) suspected drug-proceeds. However, shortly after,  
25 agents intercepted a series of phone calls and text messages (Sessions 25, 28 and 31 over  
26 TT62) between CARRILLO and MARES (TT76), which indicated to agents that  
27 CARRILLO and MARES rescheduled their meeting to occur that same day (November  
28 3, 2018). At 5:35 p.m., CARRILLO (TT62) sent a text message (Session 33) to MARES



1 (TT76) in which he told MARES, "please let me know when you are about 10 min,"  
2 meaning CARRILLO wanted 10 minutes notice before MARES arrived at the meeting  
3 location.

4 456. On November 3, 2018, between 6:27 p.m. and 6:36 p.m., agents intercepted  
5 an additional series of text messages (Sessions 33, 35, 37, 40, 42 and 44 over TT62)  
6 between CARRILLO (TT62) and MARES (TT76). During these communications,  
7 MARES told CARRILLO, "I'll arrive in 10 min." Subsequently, CARRILLO asked  
8 MARES, "what car," to which MARES responded, "White Honda I'll arrive in 3 min."  
9 From this, I believe MARES was on his way to meet CARRILLO, in a white Honda, and  
10 he was close to the address CARRILLO had previously given him. At 6:42 p.m., agents  
11 intercepted an incoming text message (Session 46 over TT62) from MARES (TT76) to  
12 CARRILLO (TT62). MARES told CARRILLO "I already saw you man," which I  
13 believe to have meant MARES was letting CARRILLO know he (MARES) had located  
14 CARRILLO. At 6:43 p.m., agents conducting surveillance in the area of 1214 Harrison  
15 Street, Seattle, observed CARRILLO get into a **white 1998 Honda bearing Washington**  
16 **license BKC6466**, registered to MARES per WADOL records. Agents then watched the  
17 **white 1998 Honda bearing Washington license BKC6466** drive around the block;  
18 however, due to logistics, agents were not able to follow.

19 457. On November 4, 2018, agents intercepted an outgoing text message  
20 (Session 49) from CARRILLO (TT62) to MARES (TT76). CARRILLO told MARES,  
21 "Hey there were 31,005." Based on the communications described above, agents'  
22 observations, my training and experience and my knowledge of the CASTRO DTO, I  
23 believe MARES met with CARRILLO on November 3, 2018, and delivered \$31,005 in  
24 suspected drug proceeds to him. I believe that MARES meets with CARRILLO or other  
25 money transporters for the CASTRO DTO regularly, and has been doing so for some  
26 time, based on the nature of this observed meeting and the conversation leading up to it.  
27 The meeting occurred very quickly, and MARES did not have to determine if he  
28 (MARES) was meeting with the correct person. In fact, MARES indicated he had

1 "already seen" CARRILLO before CARRILLO got into MARES' **white 1998 Honda**  
 2 **bearing Washington license BKC6466.**

3 458. On November 7, 2018, agents received authorization from the Honorable  
 4 David W. Christel, United States Magistrate Judge for the Western District of  
 5 Washington, to activate real time tracking of TT76. On November 8, 2018, agents set out  
 6 on surveillance in order to determine the user of TT76. During that operation, agents set  
 7 up surveillance at **1312 80th Ave. SE, Lake Stevens, Washington**, which was TT76's  
 8 location based on real-time tracking data at that time. Agents observed the **white 1998**  
 9 **Honda bearing Washington license BKC6466** parked on the street in front of **1312**  
 10 **80th Ave. SE, Lake Stevens, Washington**. Agents also observed a **blue 2016 Toyota**  
 11 **Tacoma bearing Washington license C08613M**, registered to MARES per WADOL  
 12 records, parked in the driveway of **1312 80th Ave. SE, Lake Stevens, Washington**.  
 13 Based on agents' observations during physical surveillance, including the above-  
 14 mentioned instances, and the frequency of calls intercepted between MARES and Target  
 15 Telephone numbers in this investigation, I believe MARES is a significant redistributor  
 16 for the CASTRO DTO who has direct access to CARRILLO (unlike, e.g., URIAS, who  
 17 provides his drug proceeds to ROCHA and/or LOPEZ, who then pass them along to  
 18 CARRILLO). I further believe drugs and/or drug proceeds are stored at **1312 80th Ave.**  
 19 **SE, Lake Stevens, Washington.**

20 459. MARES has no known criminal history.

21 **tt) Location 46. Residence of Oscar CARRILLO: Airmark Apartments,**  
 22 **229 Andover Park E, Apartment 409, Tukwila, Washington.**

23 460. I have discussed Oscar CARRILLO throughout this Affidavit, and  
 24 specifically in Subsection (oo). On November 14, 2018, agents intercepted a call  
 25 (Session 162 over TT62) between CARRILLO and an employee of the **Airmark**  
 26 **Apartments**, using 206-988-8866. During that call, CARRILLO identified himself as  
 27 Greg WERBER and scheduled an appointment for a walk-through in one of the  
 28 apartments. Additionally, CARRILLO provided his number (TT62) to **Airmark** as a

1 good contact number. CARRILLO scheduled his appointment for 2:00 p.m. on  
2 November 15, 2018.

3 461. In anticipation of the scheduled appointment, agents began conducting  
4 surveillance in the area of the **Airmark Apartments, 229 Andover Park E, Tukwila,**  
5 **Washington.** At 1:57 p.m., agents noticed real-time tracking data for TT37 (WERBER)  
6 was near the **Airmark Apartments, 229 Andover Park E, Tukwila, Washington.**  
7 Moments later, agents on physical surveillance observed CARRILLO and WERBER  
8 meeting in the lobby of the apartment complex with one of the employees. At that time,  
9 WERBER and CARRILLO appeared to be filling out paperwork, indicating to agents this  
10 location would likely be a new residence for CARRILLO.

11 462. At 2:24 p.m., agents on physical surveillance observed CARRILLO talking  
12 on his cellular phone. Simultaneously, agents intercepted a call (session 220 over TT62)  
13 from an unidentified male (UM8553) using 52-331-175-8553 to CARRILLO. During  
14 that call, UM8553 and CARRILLO discussed an issue UM8553 was encountering  
15 depositing money for CARRILLO to use towards a studio apartment at the **Airmark**  
16 **Apartments, 229 Andover Park E, Tukwila, Washington.** The two eventually agreed  
17 to talk later when UM8553 resolved the issue. Shortly after, CARRILLO called Puget  
18 Sound Energy (888-225-5773) to set up an account in order to have electric power  
19 activated at **229 Andover Park E, Apartment 409, Tukwila, Washington.**  
20 CARRILLO gave his name, date of birth, phone number, and email to Puget Sound  
21 Energy as his personal identifiers to be associated with his account.

22 463. As noted above in Subsection (oo), CARRILLO has accessed WERBER's  
23 storage unit where a money counter is stored. Based on the small size of WERBER's  
24 storage unit, it is highly unlikely CARRILLO uses the money counter there. I believe  
25 CARRILLO takes the money counter to his location (previously, various hotel rooms and  
26 apparent short-stay rentals) to count the suspected drug proceeds. Based on agents'  
27 observations during physical and electronic surveillance, in conjunction with intercepted  
28 communications, I believe CARRILLO likely stores at least a portion of the DTO's illicit

1 earnings at the **Airmark Apartments, 229 Andover Park E, Apartment 409, Tukwila,**  
2 **Washington**, until he is able to pass them on. Based on my experience and training, he  
3 may also have some sort of ledger indicating how much money he received from whom  
4 and when, and where he then sent the money. While CARRILLO may not be directly  
5 involved in the trafficking of drugs, his actions throughout this investigation have  
6 facilitated the drug trafficking activities for the CASTRO DTO as a whole.

7 464. CARRILLO has no known criminal history.

8 **uu) Location 47. Residence of Martin Dean GREGORY: 204 18th St. SE,**  
9 **Puyallup, Washington**

10 465. Agents first learned of Martin GREGORY's involvement with the DTO  
11 following a suspected drug transaction with HIGUERA (TV3) at a Jack in The Box  
12 parking lot in Tacoma, Washington, on July 5, 2018. On this day, when HIGUERA  
13 arrived he parked next to a **spray-painted red 2001 Lexus IS bearing Washington**  
14 **license 419ZVA**, registered in WADOL records to Martin Dean GREGORY at 1006 W  
15 Main, Puyallup, Washington, and a black 2015 Ford F-150 bearing Washington license  
16 C70294E. Special Agent Anthony DelVecchio observed a white male, later identified as  
17 GREGORY, exit the **spray-painted red 2001 Lexus IS bearing Washington license**  
18 **419ZVA** and enter TV3. Shortly after, agents observed GREGORY exit TV3, and get  
19 into the black Ford F-150. I believe GREGORY got into TV3 to ensure that HIGUERA  
20 had the drugs before retrieving the money for the drugs from the occupant of the black  
21 Ford F-150. I further believe GREGORY then went back to HIGUERA, obtained drugs  
22 from HIGUERA, and returned to the black Ford F-150 in order to supply the occupant of  
23 the black Ford F-150 with said drugs. HIGUERA departed the area shortly thereafter.  
24 This sequence with GREGORY moving between the **spray-painted red 2001 Lexus IS**  
25 **bearing Washington license 419ZVA, TV3, and the black Ford F-150** occurred in less  
26 than five minutes.

27 466. Shortly after TV3 left the Jack in the Box, agents observed GREGORY  
28 meet with several other individuals. Approximately twenty minutes later, agents

1 observed GREGORY meeting with a person occupying a Nissan Altima. Agents then  
2 observed GREGORY walk up to and lean into the passenger side of the black Ford F-150  
3 before returning to the **spray-painted red 2001 Lexus IS bearing Washington license**  
4 **419ZVA**. Based on this continued interaction between GREGORY and the driver of the  
5 black Ford F-150, I believe the driver is a criminal associate of GREGORY's, possibly  
6 providing security for GREGORY and/or potentially watching for the presence of law  
7 enforcement. GREGORY then left the Jack in the Box in the **spray-painted red 2001**  
8 **Lexus IS bearing Washington license 419ZVA**, followed by the black Ford F-150.

9 467. Agents maintained physical surveillance on the **spray-painted red 2001**  
10 **Lexus IS bearing Washington license 419ZVA** and the black Ford F-150 as they drove  
11 directly to **204 18th St. SE, Puyallup, Washington**. Based on the above described  
12 interactions with HIGUERA and GREGORY's suspected drug customers, I believe  
13 GREGORY obtained drugs from HIGUERA, sold a portion of these drugs, and  
14 immediately drove to **204 18th St. SE, Puyallup, Washington**, where GREGORY likely  
15 stored a portion of his suspected drug proceeds and/or a portion of the suspected drugs he  
16 obtained from HIGUERA at the Jack In The Box.

17 468. At around midnight of July 6, 2018, agents observed the **spray-painted red**  
18 **2001 Lexus IS bearing Washington license 419ZVA** and the black Ford F-150 leave  
19 **204 18th St. SE, Puyallup, Washington**. Agents followed the **spray-painted red 2001**  
20 **Lexus IS bearing Washington license 419ZVA** to a nearby Safeway parking lot in  
21 Puyallup, Washington, where Special Agent Samuel Landis observed GREGORY  
22 conduct several suspected drug transactions with the occupants of several vehicles in the  
23 parking lot of the Safeway. During one suspected drug transaction, agents observed  
24 GREGORY counting money as he returned to his **spray-painted red 2001 Lexus IS**  
25 **bearing Washington license 419ZVA** and then retrieve something from the center  
26 console of the **spray-painted red 2001 Lexus IS bearing Washington license 419ZVA**  
27 before returning to the suspected customer's vehicle. During the subsequent surveillance  
28 of GREGORY in the **spray-painted red 2001 Lexus IS bearing Washington license**

1 **419ZVA** and the black Ford F-150, agents observed GREGORY conducting multiple  
2 unusual driving maneuvers, indicative of counter surveillance driving, and were unable to  
3 continue following him. However, agents believe GREGORY returned to **204 18th St.**  
4 **SE, Puyallup, Washington**, since that is his registered address with WADOL and agents  
5 have since seen the vehicle at the residence during the late night/early morning hours.  
6 Based on these observations, along with training and experience, agents believe  
7 GREGORY is likely storing at least a portion of his drugs and/or drug proceeds at this  
8 location.

9 469. Agents observed this interaction between GREGORY and the CASTRO  
10 DTO in July 2018; I believe at this time that GREGORY had yet to establish himself as a  
11 trustworthy local distributor for the DTO and was likely conducting most of his drug  
12 resupplies from the DTO at public parking lots. Presently, I believe that GREGORY has  
13 established himself as a trustworthy retail level distributor for the DTO, which is agents  
14 have recently observed couriers for the DTO traveling directly to GREGORY's residence  
15 at **204 18th St. SE, Puyallup, Washington**. From September 2018 through November  
16 2018, agents have observed, via electronic surveillance, vehicles driven by couriers for  
17 the CASTRO DTO stop at **204 18th St. SE, Puyallup, Washington** over 20 times.  
18 Based on this consistent interaction between GREGORY and the CASTRO DTO, I  
19 believe GREGORY maintains at least a portion of his drugs and/or drug-proceeds at **204**  
20 **18th St. SE, Puyallup, Washington**.

21 470. GREGORY's criminal history includes 9 felony convictions, 18 gross  
22 misdemeanor convictions, and 49 arrests. GREGORY's felony convictions include  
23 attempt to elude in 2016 and 2015, controlled substance possession and theft-2 in 2014,  
24 identity theft-2 in 2013, residential burglary and assault-3 in 2010, robbery-1 in 2007, and  
25 taking a motor vehicle without permission in 2004. GREGORY served 14 months in  
26 prison starting in 2015 (attempt to elude), 13 months starting in 2010 (residential  
27 burglary), and an unknown amount of time in 2007 (robbery-1).  
28



1                    **vv) Location 48. Residence of Jose RANGEL Ortega: 11007 Paine Field**  
2                    **Way, Everett, Washington.**

3                    471. On September 29, 2018, at 2:30 p.m., agents intercepted an incoming text  
4 message to LOPEZ (Session 244 on TT51) from Sillas (TT52). This message read,  
5 "4259488579 on behalf of the mechanic and he will pay them at 8 man." The number in  
6 this text message (425-948-8579) is TT67.

7                    472. At 2:51 p.m., agents intercepted an incoming call to LOPEZ (TT51),  
8 Session 247, from Sillas (TT52). During this call, Sillas asked LOPEZ, "I sent you a  
9 message, did you get it?" LOPEZ replied, "I'm looking at it, the one that was on behalf  
10 of the mechanic." Sillas then said, "Yes, give him 200 buttons and then mark them,  
11 already... he is going to pay eight for them." From this call, agents believed Sillas was  
12 instructing LOPEZ to ready 200 counterfeit oxycodone pills (made with fentanyl) for sale  
13 to a person associated to another DTO member with the nickname "the mechanic."  
14 Agents believe this associated individual was going to pay \$8.00 per pill, based on Sillas'  
15 statements during this call.

16                    473. At 3:34 p.m., agents intercepted an outgoing call, Session 253, from  
17 LOPEZ (TT51) to the user of TT67, later identified as Jose Alfredo RANGEL Ortega  
18 based on physical/electronic surveillance and WADOL records. During the call, LOPEZ  
19 told RANGEL, "What's up man? I need to give you some buttons on behalf of the  
20 mechanic." RANGEL asked LOPEZ what area he was in, and LOPEZ said he was in the  
21 Renton area. RANGEL told LOPEZ he (RANGEL) would call LOPEZ once he was free  
22 because he was "here, by Everett" at that time. The two agreed to meet later. Agents  
23 believe LOPEZ was referring to counterfeit oxycodone pills (made with fentanyl) when  
24 he used the word "buttons" in this call. The sale of these pills has become a mainstay of  
25 the CASTRO DTO's operations in Western Washington.

26                    474. At 4:54 p.m., agents intercepted Session 255, an incoming call on TT51  
27 (LOPEZ) from RANGEL (TT67). During this call, RANGEL confirmed LOPEZ was  
28 working for Sillas and then asked LOPEZ for an additional 1,000 pills, on top of the 200

1 for "the mechanic." RANGEL told LOPEZ to tell Sillas these extra thousand pills were  
2 on behalf of "Pañal," and that the order had already been placed. Agents believe "Pañal"  
3 may be RANGEL's manager in Mexico, similar to the relationship between Sillas and  
4 DTO members LOPEZ and ROCHA. RANGEL also asked LOPEZ not to tell "the  
5 mechanic" of this arrangement. LOPEZ told RANGEL that he (LOPEZ) would check on  
6 whether he (LOPEZ) could supply that amount of pills to RANGEL.

7 475. After this call, LOPEZ (TT51) immediately called Sillas (TT52), Session  
8 256. During the call, Sillas instructed LOPEZ to give RANGEL "one thousand two  
9 hundred and he will give you an additional ten bucks." Sillas more explicitly told  
10 LOPEZ to give RANGEL the 1,000 pills at a price of \$6.50 per pill, and the other 200  
11 pills for the mechanic at a price of \$8.00 per pill. Sillas said RANGEL would give  
12 LOPEZ an additional \$10,000 on top of the cost of these pills. Twenty minutes later,  
13 LOPEZ provided RANGEL (TT67) with the address to the Auburn Outlet Collection  
14 Mall in a text message (intercepted as Session 261). Agents believe it took LOPEZ  
15 twenty minutes to send that message because he had to count the pills he was going to  
16 sell to RANGEL at the Auburn Outlet Collection Mall.

17 476. Between 5:33 p.m. and 5:56 p.m., agents intercepted Sessions 266, 268,  
18 270 on TT51, all of which coincided with tracking data for LOPEZ's vehicle, **TV4**. **TV4**  
19 left **22025 100th Ave. SE, Kent, Washington** (which was LOPEZ's residence at the  
20 time) at 5:35 p.m. Just before that, in a call intercepted as Session 266, LOPEZ sounded  
21 flustered (like he was rushing out the door) and told RANGEL he was 20 minutes away  
22 from the meeting location. **TV4's** tracking showed LOPEZ traveled directly to the  
23 Auburn Outlet Collection Mall from **22025 100th Ave. SE, Kent, Washington**.

24 477. At 5:52 p.m., agents intercepted Session 268 on TT51, during which  
25 LOPEZ told RANGEL (TT67) that he was almost at the mall. RANGEL said he was  
26 pumping gas nearby, but would be right over. Surveillance footage at the mall showed a  
27 grey Scion TC (that matched WADOL records showing a **grey Toyota Scion TC**  
28 **bearing Washington license BGH6676 (TV13)** registered to RANGEL) parked in the

1 mall's parking lot, south of the Burlington store. RANGEL got out of TV13 and began  
2 walking toward the mall. TV4 arrived at the mall at 5:55 p.m. and approached the front  
3 of the Burlington. At 5:56 p.m., agents intercepted Session 270 over TT51. During this  
4 call, RANGEL (TT67) confirmed LOPEZ was driving a red Ford Ranger truck (TV4)  
5 and told LOPEZ that he could see that very truck driving in the parking lot. RANGEL  
6 said he was walking right behind LOPEZ's truck at the time of the call. Surveillance  
7 footage showed RANGEL got into TV4 as the front passenger at that same time.

8 478. TV4 then drove east across the front of the mall, turned around, and drove  
9 west across the mall parking lot. After this, LOPEZ drove TV4 close to where RANGEL  
10 had parked TV13 in the parking lot. LOPEZ stopped to let RANGEL out of TV4 and  
11 then drove away. TV4 drove directly out of the mall parking lot. RANGEL got into  
12 TV13 and drove around the entire mall before he eventually exited onto 15th Street.  
13 Agents believe this was possibly a counter-surveillance maneuver, since it was otherwise  
14 unnecessary for RANGEL to drive in this manner. Based on intercepted  
15 communications, surveillance footage, my training and experience, I believe LOPEZ  
16 delivered 1,200 counterfeit oxycodone pills to RANGEL during this meeting, in  
17 exchange for over \$15,000 in cash—\$6,500 for RANGEL's 1,000 pills, \$1,600 for the  
18 mechanic's 200 pills, and an extra \$10,000, as described by Sillas.

19 479. Agents have seen additional suspected drug/money transactions between  
20 LOPEZ and RANGEL during this investigation. Agents positively identified RANGEL  
21 as the user of TT67 through physical surveillance conducted during those additional  
22 meetings. Intercepted communications supported the physical surveillance observations,  
23 and showed RANGEL used TT67 to facilitate the transactions. Agents have observed  
24 RANGEL driving TV13 to meetings with couriers for the CASTRO DTO. TV13 is  
25 registered to RANGEL at **11007 Paine Field Way, Everett, Washington**. RANGEL's  
26 WADOL listed address is also **11007 Paine Field Way, Everett, Washington**.  
27 Additionally, on November 18, 2018, agents observed TV13 parked near **11007 Paine**  
28 **Field Way, Everett, Washington** during physical surveillance.

1        480. Agents do not believe RANGEL has a storage unit nor do agents believe he  
2 has a stash house/secondary residence. Based on this and my training and experience, I  
3 believe the only feasible place for RANGEL to store his drug and/or drug proceeds is in  
4 his vehicle (TT13) and/or his residence, **11007 Paine Field Way, Everett, Washington.**

5        481. RANGEL's criminal history appears to consist of driving-related offenses  
6 in Georgia.

7        **VIII. PROBABLE CAUSE FOR THE VEHICLES TO BE SEARCHED**

8        482. I have described many of the vehicles this Application requests  
9 authorization to search throughout Sections V and VII of this Affidavit. Where those  
10 vehicles have already been discussed and probable cause established, I have indicated  
11 below where. I have not yet discussed some of the vehicles, and have provided a brief  
12 description of the probable cause to search each of those vehicles below.

13        483. During the instant investigation, which has spanned over a year, agents  
14 have identified many vehicles that are believed to be used in the facilitation of the  
15 CASTRO DTO's drug-trafficking activities in Western Washington, including vehicles  
16 other than those described in this Affidavit. The use of many vehicles is consistent with a  
17 practice commonly known as "icing" vehicles, which is the practice of parking one  
18 vehicle for an extended period while driving another. Drug traffickers typically do this,  
19 based on my training and experience, in an attempt to prevent any one vehicle from being  
20 used regularly during drug transactions for a long period. This is done in an attempt to  
21 thwart the efforts of law enforcement who might try to conduct physical and/or electronic  
22 surveillance of the DTO's commonly used vehicles. In the case of the CASTRO DTO,  
23 this has been done on a few occasions in direct response to law enforcement efforts  
24 targeting particular CASTRO DTO vehicles. This application seeks permission to search  
25 35 specific vehicles identified as having been used in the CASTRO DTO's activities,  
26 whether or not they are within the curtilage of the residential locations described in this  
27 Affidavit and Attachments A and A1 through A48.  
28

- 1           a.       **A red 2006 Ford Ranger bearing Washington license C04697M**  
 2                   **and/or Vehicle Identification Number (VIN)**  
 3                   **1FTYR44E66PA14670, registered to Gerardo Arias at 1020 SW**  
                   **126th St, Apt 214, Burien, Washington.**

4           484. This vehicle is referenced in bold, as **TV4**, throughout Section VII of this  
 5 Affidavit. **LOPEZ, ROCHA, and AVILES** have each used **TV4** since April 2018.

- 6           b.       **A white 2008 Honda Accord bearing Washington license BJN4395**  
 7                   **and/or VIN 1HGCP26808A009967, registered to Shawn Shaputis**  
 8                   **at 8188 Graystone Way NW, Silverdale, Washington.**

9           485. This vehicle is referenced in bold, as **TV3**, throughout Section VII of this  
 10 Affidavit. **HIGUERA and SARMIENTO** have used **TV3** since April 2018.

- 11           c.       **A red 2002 Honda Civic bearing Washington license BKS2788**  
 12                   **and/or VIN 1HGEM22912L053228, registered to Jaime**  
 13                   **HEREDIA Castro at 10115 Holly Drive, Apt B106, Everett,**  
                   **Washington.**

14           486. This vehicle is referenced in bold as a **red Honda Civic bearing**  
 15 **Washington license BKS2788**, in Sections VII(f) and (u) of this Affidavit. **HEREDIA**  
 16 **has used this red Honda Civic bearing Washington license BKS2788** throughout the  
 17 instant investigation.

- 18           d.       **A beige 2001 Jeep Grand Cherokee bearing Washington license**  
 19                   **BKG1931 and/or VIN 1J4GW58N01C666831, registered to Juan**  
 20                   **Carlos AVILES at 11239 SE 260th St, Apartment D306, Kent,**  
                   **Washington.**

21           487. This vehicle is registered to and used by Juan Carlos AVILES, a suspected  
 22 drug redistributor for the CASTRO DTO in Western Washington as described in Section  
 23 VII (g). Though this vehicle has not been specifically mentioned in this Affidavit, agents  
 24 have seen AVILES use this vehicle on several occasions, including leading up to and  
 25 following a meeting with LOPEZ at the **22025 100th Ave. SE, Kent, Washington** stash  
 26 residence. Specifically, on October 25, 2018, agents observed AVILES drive the **beige**  
 27 **2001 Jeep Grand Cherokee bearing Washington license BKG1931 to 22025 100th**  
 28

1 Ave. SE, Kent, Washington residence where TV4 was also parked. I believe the beige  
 2 **2001 Jeep Grand Cherokee bearing Washington license BKG1931** is AVILES'  
 3 primary vehicle, based on surveillance observations from October 2018. Based on what I  
 4 know about drug traffickers, I know it would be completely normal for AVILES to keep  
 5 a portion of his drugs or drug proceeds in his vehicle, in order to help him quickly  
 6 facilitate drug transactions with one of his customers if the need arises.

7 e. **A 2016 Nissan Frontier bearing Washington license C30123H**  
 8 **and/or VIN 1N6AD0EV0GN768584, registered to Cindy**  
 9 **SOLTERO Jimenez at 31600 126th Ave. SE, Space 106, Auburn,**  
 10 **Washington.**

11 488. This vehicle is referenced in bold as a **2016 Nissan Frontier bearing**  
 12 **Washington plate C30123H**, in Section VII (d) of this Affidavit. SOLTERO has used  
 13 this **2016 Nissan Frontier bearing Washington plate C30123H** during the instant  
 14 investigation.

15 f. **A black 2007 Kia Rondo, bearing Washington license BLE9305**  
 16 **and/or VIN KNAFG525477034596, registered to Hector URIAS**  
 17 **Moreno at 428 105th St. SW, Everett, Washington.**

18 489. This vehicle is referenced in bold, as TV7, throughout Section VII of this  
 19 Affidavit. TV7 has been URIAS' principle mode of transportation throughout this  
 20 investigation.

21 g. **A green 2005 BMW X5 bearing Washington license BJM0956**  
 22 **and/or VIN 5UXFA13595LY22689, registered to Alma Yesenia**  
 23 **Moran Reyes at 125 SW Campus Dr., Apartment 4-205, Federal**  
 24 **Way, Washington.**

25 490. This vehicle is referenced in bold, as TV9, in Section VII of this Affidavit.  
 26 Carlos CASTRO has used TV9 during the instant investigation.  
 27  
 28



- 1           h.       **A 2008 black Honda Civic bearing Washington License BFZ2558**  
2                   **and/or VIN 2HGFG21538H701703, registered to Adonia**  
3                   **Melendez at 8024 150th St SE, Snohomish, Washington.**

4           491.   This vehicle is referenced in bold as a **2008 black Honda Civic bearing**  
5           **Washington License BFZ2558**, in Section VII (k) of this Affidavit. Michael SCOTT  
6           has used this **2008 black Honda Civic bearing Washington License BFZ2558** during  
7           the instant investigation.

- 8           i.       **A 2000 tan Chevy Silverado bearing Washington license C67402H**  
9                   **and/or VIN 1GCEK19T7YE110772, registered to Jason Reed at**  
10                  **1228 Crowe St. SE, Lacey, Washington.**

11           492.   This vehicle is referenced in bold as a **2000 tan Chevy Silverado bearing**  
12           **Washington license C67402H** in Sections VII(n) and (o) of this affidavit. Julian Gauge  
13           ORDONEZ has used this **2000 tan Chevy Silverado bearing Washington license**  
14           **C67402H** during the instant investigation.

- 15           j.       **A silver 2013 Toyota Highlander bearing Washington license**  
16                   **AQB8456 and/or VIN 5TDBK3EH8DS272785, registered to**  
17                   **Michael and Esther SCOTT at 8024 150th St. SE, Snohomish,**  
18                   **Washington.**

19           493.   This vehicle is referenced in bold as a **silver 2013 Toyota Highlander**  
20           **bearing Washington license AQB8456**, in Section VII (k) of this Affidavit. Esther  
21           SCOTT has used this **silver 2013 Toyota Highlander bearing Washington license**  
22           **AQB8456** during the instant investigation.

- 23           k.       **A grey Toyota Camry bearing Washington license BKD8497**  
24                   **and/or VIN 4T1BE46K49U323365, registered to Aureliano De**  
25                   **Jesus-Bazante at 2010 Front St., Trailer 7, Lynden, Washington.**

26           494.   This vehicle is referenced in bold as a **grey Toyota Camry bearing**  
27           **Washington license BKD8497** in Section VII (rr) of this Affidavit. Edgar CABRERA  
28           has used this **grey Toyota Camry bearing Washington license BKD8497** during the  
instant investigation.

- 1           l.       **A red 1995 Mitsubishi Eclipse bearing Washington license**  
2                   **AEV9270 and/or VIN 4A3AK44YXSE181939, registered to**  
3                   **Jessica JOHNSON at 314 N 133rd St., Seattle, Washington.**

4           495. This vehicle is referenced in bold as a **red Mitsubishi Eclipse bearing**  
5 **Washington license AEV9270**, in Section VII (q) of this Affidavit. Rolando  
6 **ESPINDOLA** has used this **red Mitsubishi Eclipse bearing Washington license**  
7 **AEV9270** during the instant investigation.

- 8           m.       **A 2010 Harley Davidson motorcycle bearing Washington License**  
9                   **3E8988 and/or VIN 1HD1FR419AB631070, registered to Gerald**  
10                  **RIGGINS at 5824 152nd St. E, Puyallup, Washington.**

11           496. This vehicle is referenced in bold as a **2010 Harley Davidson motorcycle**  
12 **bearing Washington License 3E8988**, in Section VII (m) of this Affidavit. Gerald  
13 **RIGGINS** has used this **Harley Davidson motorcycle bearing Washington License**  
14 **3E8988** during the instant investigation.

- 15           n.       **A silver 2000 Toyota Camry bearing Washington license**  
16                   **BKU5269 and/or VIN 4T1BG22K8YU641962, registered to**  
17                   **Michael SURYAN at 2131 Freestad Rd., Arlington, Washington.**

18           497. This vehicle is referenced in bold as a **silver 2000 Toyota Camry bearing**  
19 **Washington license BKU5269**, in Section VII (v) of this Affidavit. The **silver 2000**  
20 **Toyota Camry bearing Washington license BKU5269** is registered to Michael  
21 **SURYAN** and has been observed in the driveway of his **16809 8th Ave SW, Normandy**  
22 **Park, Washington** residence during the instant investigation.

- 23           o.       **A grey 2007 Toyota Scion, bearing Washington license BGH6676**  
24                   **and/or VIN JTKDE177170159625, registered as sold to Josafat**  
25                   **RANGEL at 11007 Paine Field Way, Everett, Washington.**

26           498. This vehicle is reference in bold as **TV13**, in Section VII (vv) of this  
27 Affidavit. **TV13** is registered as sold to Josafat **RANGEL**, suspected to be an alias used  
28 by Jose **RANGEL Ortega**, at **11007 Paine Field Way, Everett, Washington** and has

1 been observed in the vicinity of that residence. RANGEL has used TV13 during the  
2 instant investigation.

3 p. **A white 1998 Honda bearing Washington license BKC6466 and/or**  
4 **VIN 1HGCG2258WA023530, registered to Constantino MARES**  
5 **Garcia at 16717 Alderwood Mall Pkwy, Apartment K304,**  
6 **Lynnwood, Washington.**

7 499. This vehicle is referenced in bold as a **white 1998 Honda bearing**  
8 **Washington license BKC6466**, in Section VII (ss) of this Affidavit. This **white 1998**  
9 **Honda bearing Washington license BKC6466** is registered to MARES and has been  
10 observed near MARES' 1312 80th Ave SE, Lake Stevens, Washington residence.  
11 MARES has used this **white 1998 Honda bearing Washington license BKC6466**  
12 during the instant investigation.

13 q. **A blue 2016 Toyota Tacoma bearing Washington license**  
14 **C08613M and/or VIN 3TMCZ5AN2GM006576, registered to**  
15 **Constantino MARES Garcia at 2510 164th St. SW, Apartment**  
16 **B105, Lynnwood, Washington**

17 500. This vehicle is referenced in bold as a **blue 2016 Toyota Tacoma bearing**  
18 **Washington license C08613M**, in Section VII (ss) of this Affidavit. This **blue 2016**  
19 **Toyota Tacoma bearing Washington license C08613M** is registered to MARES and  
20 has been observed in the driveway of his 1312 80th Ave SE, Lake Stevens, Washington  
21 residence during the instant investigation.

22 r. **A red 2018 Chevrolet Silverado, bearing Washington license**  
23 **C66267L and/or VIN 3GCUKSEC7JG172100, registered to**  
24 **Wenceslao BARAJAS-Barajas at 628 East Fairhaven Ave.,**  
25 **Burlington, Washington.**

26 501. This vehicle is referenced in bold as a **red 2018 Chevrolet Silverado**  
27 **bearing Washington license C66267L**, in Sections VII (w) and (y) of this Affidavit.  
28 Orlando BARAJAS has used this **red Chevrolet Silverado bearing Washington license**  
**C66267L** during the instant investigation.

1 s. **A spray-painted red 2001 Lexus IS bearing Washington license**  
2 **419ZVA and/or VIN JTHBD182410010023, registered as sold to**  
3 **Martin Dean GREGORY at 1006 W Main, Puyallup, Washington.**

4 502. This vehicle is referenced in bold as a **spray-painted red 2001 Lexus IS**  
5 **bearing Washington license 419ZVA**, in Section VII (uu) of this Affidavit. GREGORY  
6 has used this **spray-painted red 2001 Lexus IS bearing Washington license 419ZVA**  
7 during the instant investigation.

8 t. **A white 2012 Dodge Ram 1500 truck bearing Washington license**  
9 **C50312M and/or VIN 1C6RD7KP8CS278496, registered to Omar**  
10 **VALTIERRA at 16508 SE 147<sup>th</sup> St., Renton, Washington.**

11 503. This vehicle is referenced in bold as a **2012 white Dodge Ram 1500**  
12 **bearing Washington license C50312M**, in Section VII(bb) of this Affidavit.  
13 VALTIERRA has used this **2012 white Dodge Ram 1500, Washington license**  
14 **C50312M** during the instant investigation.

15 u. **A 2013 black Chrysler 300 sedan bearing Washington license**  
16 **AKG4277 and/or VIN 2C3CCAAG4DH533206, registered to**  
17 **Omar VALTIERRA at 16508 SE 147th St., Renton, Washington.**

18 504. This vehicle is referenced in bold as a **2013 black Chrysler 300 sedan**  
19 **bearing Washington license AKG4277**, in Section VII (bb) of this Affidavit.  
20 VALTIERRA has used this **2013 black Chrysler 300 sedan bearing Washington**  
21 **license AKG4277** during the instant investigation.

22 v. **A 2005 grey Volkswagen Jetta bearing Oregon license 902KTS**  
23 **and/or VIN 3VWPG71K75M643370, registered to Jorge**  
24 **VALENZUELA Armenta at 515 SW 13th Place, Apartment H3,**  
25 **Hermiston, Oregon.**

26 505. This vehicle is referenced in bold as a **2005 grey Volkswagen Jetta,**  
27 **bearing Oregon license 902KTS**, in Section VII (j) of this Affidavit. VALENZUELA  
28 has used this **2005 grey Volkswagen Jetta, bearing Oregon license 902KTS** during the  
instant investigation.

1 w. **A 2001 white Nissan Altima bearing Washington license**  
 2 **AVW7517 and/or VIN 1N4DL01D41C121162, registered to**  
 3 **Cleotilde Velasco at 1400 North 30th St. 167, Mount Vernon,**  
 4 **Washington.**

5 506. This vehicle is referenced in bold as **a 2001 white Nissan Altima bearing**  
 6 **license AVW7517**, in Section VII (y) of this Affidavit. Jose VELASCO has used this  
 7 **2001 white Nissan Altima bearing license AVW751** during the instant investigation.

8 x. **A 2000 black Mercedes 5004D bearing Washington license**  
 9 **BLY6302 and/or VIN WDBNG75J9YA056681, registered to**  
 10 **Brenden K Freitas at 3201 228th St. SW, Brier, Washington.**

11 507. This 2000 black Mercedes 5004D bearing Washington license BLY6302 is  
 12 further referenced as **Target Vehicle 11 or TV11**. **TV11** is registered to Brenden K.  
 13 Freitas and used by Andrew KRISTOVICH, a suspected drug distributor in Western  
 14 Washington. Though **TV11** has not specifically been mentioned in this Affidavit, agents  
 15 observed KRISTOVICH use it to possibly meet drug customers in Lynnwood,  
 16 Washington. Specifically, on November 18, 2018, agents observed KRISTOVICH drive  
 17 **TV11** to an abandoned parking area and wait. Based on my training and experience, I  
 18 believe KRISTOVICH was meeting a customer to sell drugs. Additionally,  
 19 KRISTOVICH is a target in a separate DEA investigation that has identified **TV11** as one  
 20 he (KRISTOVICH) has used to distribute drugs. As described in Section VII (ww) of  
 21 this Affidavit, KRISTOVICH does not have a fixed residence, but rather moves from  
 22 hotel to hotel. Given this, and based on what I know about drug distributors, I know it  
 23 would be completely normal for KRISTOVICH to keep a portion of his drugs or drug  
 24 proceeds in his vehicle, in order to help him quickly facilitate drug transactions with one  
 25 of his customers.

1           y.       **A 2002 silver Mercedes 3204D bearing Washington license**  
 2                   **AYT2335 and/or VIN WDBRF64J92F203530, registered to Gabor**  
 3                   **Kallai at 3055 Burris Road Lot 148, Davie, Florida.**

4           508.   This vehicle is referenced in bold as **Target Vehicle 12 or TV12**, in  
 5   Section VII (w) of this Affidavit. Andrew KRISTOVICH has used **TV12** during the  
 6   instant investigation.

7           z.       **A 2012 white Hyundai Accent bearing California license**  
 8                   **7CQD771 and/or VIN KMHCT4AE9CU170677, registered to**  
 9                   **Victoria Mendez at 2629 Lincoln Way, D14, Lynnwood City,**  
                  **Washington.**

10          509.   This vehicle is referenced in bold as **a 2012 white Hyundai Accent**  
 11   **bearing California license 7CQD771 (TV10)**, in Section VII(s) of this Affidavit.  
 12   Carlos CASTRO has used this **2012 white Hyundai Accent bearing license 7CQD771**  
 13   during the instant investigation.

14          aa.      **A grey 2004 Hummer H2 bearing Washington license ADH9133**  
 15                   **and/or VIN 5GRGN23U94H115275, registered to Salvador**  
 16                   **HERNANDEZ at 2014 S 26th Ave, Yakima, Washington.**

17          510.   This vehicle is referenced in bold as **a grey 2004 Hummer H2 bearing**  
 18   **Washington license ADH9133**, in Section VII (qq) of this Affidavit. Carlos  
 19   HERNANDEZ has use this **grey 2004 Hummer H2 bearing Washington license**  
 20   **ADH9133** during the instant investigation.

21          bb.      **A black 1999 Toyota Corolla bearing Washington license**  
 22                   **AXZ8671 and/or VIN 1NXBR12E6XZ168642, registered to Juan**  
 23                   **Cervantes Falfan at 11315 26th Ave. S, Apartment 5-208, Burien,**  
                  **Washington.**

24          511.   This vehicle is referenced in bold as **a black 1999 Toyota Corolla bearing**  
 25   **Washington license AXZ8671**, in Section VII (aa) of this Affidavit. Uriel ZELAYA has  
 26   used this **black 1999 Toyota Corolla bearing Washington license AXZ8671** during the  
 27   instant investigation.



1 cc. A 2010 red tractor-trailer truck bearing California license  
2 XP09765 and/or VIN 1XKAD49X8AJ271744, registered to  
3 Southwester Carriers Corporation at 8684 Avenida De La Fuente,  
4 San Diego, California.

5 512. Though this 2010 red tractor-trailer truck bearing California license  
6 XP09765 has not been mentioned in this Affidavit, it has been used by Ramon  
7 PUENTES during the instant investigation for the purposes of transporting drugs and/or  
8 drug proceeds for the CASTRO DTO. For example, on October 12, 2018, at 6:58 p.m.,  
9 agents intercepted an incoming call (Session 1799 over TT51) from PUENTES (TT64) to  
10 LOPEZ (TT51). During Session 1799, PUENTES told LOPEZ he was on "Highway 90,"  
11 which I believe was likely a reference to Interstate 90. PUENTES then asked LOPEZ if  
12 he was going to bring some "receipts" to him. Based on my training and experience and  
13 my knowledge of this investigation, I know these drug traffickers to utilize references to  
14 paper materials (e.g., receipts) as coded language for money. From the conversation  
15 described below, agents also learned PUENTES was the likely "gusano" (truck driver)  
16 referred to in LOPEZ's earlier communications.

17 513. At 7:01 p.m., agents intercepted an incoming text message (Session 1802  
18 over TT51) from PUENTES (TT64) to LOPEZ (TT51). This text message contained an  
19 address of "46600 SE North Bend Way, North Bend, WA 98045," a truck stop called TA  
20 Truck Service just off Interstate 90 in North Bend, Washington. Based on the previous  
21 communication between LOPEZ and PUENTES, agents believed this would be their  
22 likely meeting location. Immediately after intercepting this text message, agents began  
23 conducting physical surveillance in the area of TA Truck Service in anticipation of a  
24 meeting between PUENTES and LOPEZ.

25 514. At 8:29 p.m., agents intercepted an outgoing call (Session 1811 over TT51)  
26 from LOPEZ (TT51) to PUENTES (TT64). During this call, agents believe LOPEZ told  
27 PUENTES he would be there (i.e., at TA Truck Service) in five-minutes. PUENTES then  
28 told LOPEZ to meet him "where the trucks are at," further indicating to agents

1 PUENTES would be likely driving a tractor-trailer. Based on my training, experience,  
2 and previously intercepted communications between LOPEZ and PUENTES, I believe  
3 when PUENTES asked, "Are you bringing it inside a box or something?" he wanted to be  
4 sure LOPEZ was going to conceal the suspected drug proceeds in order to reduce  
5 unnecessary attention from passers-by or detection from law enforcement. I further  
6 believe this type of behavior is consistent with that of a drug trafficker taking precaution  
7 in order to avoid detection.

8 515. At 8:34 p.m., agents intercepted an outgoing call (Session 1813 over TT51)  
9 to PUENTES (TT64) from LOPEZ (TT51). During this call, LOPEZ relayed to  
10 PUENTES that he had arrived "where the restaurant is at." Agents then traveled to the  
11 neighboring restaurant, Country Pride, in order to locate LOPEZ. At 8:35 p.m., agents  
12 found LOPEZ (in TV4) parked at the Country Pride restaurant, next door to TA Truck  
13 Services. A couple minutes later, agents then observed a Hispanic male—positively  
14 identified as PUENTES based on past surveillance photographs—walk from TA Truck  
15 Services over to TV4 and get inside. Agents watched LOPEZ and PUENTES meet in  
16 TV4 for a couple of minutes. At 8:39 p.m., TV4—occupied by LOPEZ and  
17 PUENTES—drove over to an area where TA Truck Services allotted space for tractor-  
18 trailer parking.

19 516. Subsequently, agents conducting surveillance lost sight of TV4; however,  
20 agents did locate a **2010 red tractor-trailer truck bearing California license XP09765**.  
21 PUENTES was driving this same **2010 red tractor-trailer truck bearing California**  
22 **license XP09765** when he met with LOPEZ on October 5, 2018, for a suspected bulk  
23 drug delivery. At 8:40 p.m., agents saw PUENTES in the **2010 red tractor-trailer truck**  
24 **bearing California license XP09765** digging around in the cab as if he was trying to  
25 hide something (i.e., what I believe to have been the bulk cash he recently obtained from  
26 LOPEZ). At 8:48 p.m., agents saw LOPEZ (TV4) leave the area and discontinued  
27 surveillance. This is just one instance where agents have observed PUENTES utilizing  
28

1 the **2010 red tractor-trailer truck bearing California license XP09765** during physical  
2 surveillance of the CASTRO DTO.

3 517. Agents will only seek to execute the search warrant on the **2010 red**  
4 **tractor-trailer truck bearing California license XP09765** if it is located in this District.

5 dd. **A blue 2004 Volvo S80 bearing Washington license plate**  
6 **BHK8013, registered to Jerry RODRIGUEZ Jaime at 859 116th**  
7 **Street S, Tacoma, Washington.**

8 518. This vehicle is referenced in bold as a **blue 2004 Volvo S80 bearing**  
9 **Washington license plate BHK8013** in Section VII (cc) of this Affidavit.  
10 RODRIGUEZ has used this **blue 2004 Volvo S80 bearing Washington license plate**  
11 **BHK8013** during the instant investigation.

12 ee. **A silver 2006 BMW bearing Washington license AYY7257 and/or**  
13 **VIN WBAVB13536PT26465, registered to Brian LIVELY at 8123**  
14 **71st Pl. SE, Snohomish, Washington.**

15 519. This vehicle is referenced in bold as a **silver 2006 BMW bearing**  
16 **Washington license AYY7257**, in Section VII (z) of this Affidavit. LIVELY has used  
17 this **silver 2006 BMW bearing Washington license AYY7257** during the instant  
18 investigation.

19 ff. **A black Chevrolet Silverado bearing Washington license C21970N**  
20 **and/or VIN 3GCUKREC8JG497850, registered to Brian LIVELY**  
21 **at 8123 71st Pl. SE, Snohomish, Washington.**

22 520. This vehicle is referenced in bold as a **black Chevy Silverado with no**  
23 **rear license plate**, in Section VII (z) of this Affidavit. This black Chevrolet Silverado  
24 bearing Washington license C21970N has been in the driveway of LIVELY's **8123 71st**  
25 **Pl. SE, Snohomish, Washington** residence several times during the instant investigation.

1           gg.     **A blue Ford focus bearing Washington License BER8834 and/or**  
 2                 **VIN 1FAFP34P32W344894, registered to Nicole Duke at 75 NE**  
 3                 **Brookdale Ln, Apartment E102, Bremerton, Washington.**

4           521. This vehicle is referenced in bold as a **blue Ford focus bearing**  
 5 **Washington License BER8834**, in Section VII (nn) of this Affidavit. Larry SWEITZER  
 6 has used this **blue Ford focus bearing Washington License BER8834** during the  
 7 instant investigation.

8           hh.     **A 1996 white Nissan Maxima bearing Washington license**  
 9                 **BGR7720, registered to Joshua MENDIOLA at 10502 141st St.**  
 10                **Court E, Puyallup, Washington.**

11           522. This vehicle is referenced in bold as a **1996 white Nissan Maxima bearing**  
 12 **Washington license BGR7720**, in Section VII (ee) of this Affidavit. Joshua  
 13 MENDIOLA has used this **1996 white Nissan Maxima bearing Washington license**  
 14 **BGR7720** during the instant investigation.

15           ii.     **A grey 2016 Honda Accord bearing Arizona license CJN8101 and**  
 16                 **Oregon license CA99207 and/or VIN 1HGCR2F72GA220572,**  
 17                 **registered to Paola Edith Morales Ortiz at 5727 East Seneca**  
 18                 **Street, Tucson, Arizona.**

19           523. On November 15 and 16, 2018, agents conducted physical and electronic  
 20 surveillance of Carlos LOPEZ. On both of those days, agents saw LOPEZ meet with  
 21 Oscar CARRILLO for two separate money drops that occurred at the Southcenter Mall.  
 22 Agents were still intercepting communications over CARRILLO's phone (TT62) during  
 23 that time.

24           524. Agents intercepted a number of communications between LOPEZ and  
 25 CARRILLO on November 15, 2018. Based on physical and electronic surveillance  
 26 during that day, agents knew CARRILLO was with Gregory WERBER, in Western  
 27 Washington, and the two were there to rent an apartment for CARRILLO in Tukwila,  
 28 Washington. LOPEZ and CARRILLO agreed to meet at the Southcenter Mall for  
 LOPEZ to deliver drug proceeds to CARRILLO. Prior to this money drop, agents had

1 watched LOPEZ meet with other members of the DTO, including SCOTT, URIAS,  
2 VALENZUELA, and a newly identified member of the DTO, known only at this time by  
3 his nickname, "WILSON."

4 525. Once LOPEZ had finished his suspected money pickups from other  
5 members of the DTO, he contacted CARRILLO and the two agreed to meet at the  
6 Southcenter Mall in Tukwila, Washington. Agents were physically watching LOPEZ and  
7 CARRILLO at that time. As it got closer to their agreed-upon meeting time, CARRILLO  
8 left the hotel he was staying in and drove a **grey 2016 Honda Accord bearing Arizona**  
9 **license CJN8101 and Oregon license CA99207** to the Southcenter Mall. At that time,  
10 agents noticed the vehicle had an Oregon license plate displayed on the front of the  
11 vehicle and an Arizona license plate displayed on the rear of the vehicle. Agents checked  
12 Arizona and Oregon vehicle licensing records and found the VINs associated with the  
13 two different license plates was the same.

14 526. LOPEZ and CARRILLO met in the mall on November 15, 2018, and  
15 LOPEZ handed a shopping bag to CARRILLO. They then walked out of the mall  
16 together and went over to LOPEZ's vehicle (TV4) in the parking lot. LOPEZ retrieved a  
17 small black bag from TV4's back seat. LOPEZ gave that bag to CARRILLO and  
18 CARRILLO placed it inside the shopping bag LOPEZ had given him earlier.  
19 CARRILLO took that bag over to his **grey 2016 Honda Accord bearing Arizona**  
20 **license CJN8101 and Oregon license CA99207**, left the mall, and returned to the hotel  
21 where WERBER was located. Based on intercepted communications over TT70  
22 (LOPEZ), agents believe LOPEZ delivered \$59,000 of drug proceeds to CARRILLO  
23 during their meeting. Based on agents' observations, they know CARRILLO used the  
24 **grey 2016 Honda Accord bearing Arizona license CJN8101 and Oregon license**  
25 **CA99207** to transport these proceeds. They believe he may have given these proceeds  
26 directly to WERBER once the two of them met back up at the hotel in Tukwila.  
27 CARRILLO drove WERBER back to the airport (in the **grey 2016 Honda Accord**  
28

1 bearing Arizona license CJN8101 and Oregon license CA99207) immediately after  
2 CARRILLO got back from this meeting with LOPEZ.

3 527. On November 16, 2018, LOPEZ met with CARRILLO again and the two  
4 conducted a very similar set of activities at the Southcenter Mall. Agents watched  
5 CARRILLO accept another bag from LOPEZ (a bag which LOPEZ pulled from TV4);  
6 and then CARRILLO transported that bag in the grey 2016 Honda Accord bearing  
7 Arizona license CJN8101 and Oregon license CA99207 back to the Airmark  
8 Apartments, 229 Andover Park E, Apartment 409, Tukwila, Washington. Agents  
9 believe CARRILLO has used and is using the grey 2016 Honda Accord bearing  
10 Arizona license CJN8101 and Oregon license CA99207 to transport drug proceeds and  
11 facilitate the money laundering activities of the CASTRO DTO. I believe evidence of  
12 these crimes may be located with the vehicle.

#### 13 IX. TACTICS USED BY DRUG TRAFFICKERS

14 528. Based upon my training, experience, and participation in this and other  
15 investigations involving narcotics trafficking, my conversations with other experienced  
16 investigators and law enforcement investigators with whom I work, and interviews of  
17 individuals who have been involved in the trafficking of methamphetamine, cocaine,  
18 oxycodone, fentanyl and other drugs, I have learned and know the following:

19 529. Drug trafficking organizations often use "stash houses" to conceal their  
20 illegal activities and contraband. Such stash houses allow drug traffickers to keep their  
21 contraband at a hidden location, where they may not live, thereby making it more  
22 difficult for law enforcement and/or competitors to identify these locations where drugs  
23 and drug proceeds may be hidden.

24 530. It is common for drug dealers to hide proceeds of illegal narcotics sales and  
25 records of illegal narcotics transactions in secure locations within their residences, stash  
26 houses, storage units, garages, outbuildings and/or vehicles on the property for their  
27 ready access and to conceal them from law enforcement authorities.



1           531. It is common to find papers, letters, billings, documents, and other writings,  
2 which show ownership, dominion, and control of businesses, residences, and/or vehicles  
3 in the residences, stash houses, storage units, garages, outbuildings and/or vehicles of  
4 drug traffickers. Items of personal property that tend to identify the person(s) in  
5 residence, occupancy, control, or ownership of the premises also include canceled mail,  
6 deeds, leases, rental agreements, photographs, personal telephone books, diaries, utility  
7 and telephone bills, statements, identification documents, keys, financial papers, rental  
8 receipts and property ownership papers, personal and business telephone and address  
9 books and telephone toll records, and other personal papers or identification cards in the  
10 names of subjects involved in the criminal activity being investigated.

11           532. Drug traffickers frequently amass large proceeds from the illegal sale of  
12 controlled substances that they attempt to legitimize. To accomplish this goal, drug  
13 traffickers use financial institutions and their attendant services, securities, cashier's  
14 checks, safe deposit boxes, money drafts, real estate, shell operations, and business  
15 fronts. Persons involved in drug trafficking and/or money laundering keep papers  
16 relating to these activities for future reference, including federal and state tax records,  
17 loan records, mortgages, deeds, titles, certificates of ownership, records regarding  
18 investments and securities, safe deposit box rental records and keys, and photographs. I  
19 know from my training and experience that often items of value are concealed by persons  
20 involved in large-scale drug trafficking inside of safes, lock boxes, and other secure  
21 locations within their residences, outbuildings, and vehicles.

22           533. Drug traffickers very often place assets in names other than their own to  
23 avoid detection of these assets by government agencies, and even though these assets are  
24 in other individual or business names, the drug dealers actually own and continue to use  
25 these assets and exercise dominion and control over them.

26           534. Drug traffickers often document aspects of their criminal conduct through  
27 photographs or videos of themselves, their associates, their property, and their product.  
28 Drug traffickers usually maintain these photographs or videos in their possession.

1        535. Drug traffickers often maintain large amounts of US currency in order to  
2 maintain and finance their ongoing illegal drug trafficking business. Drug traffickers  
3 from other countries operating in the United States frequently use wire remitters and bulk  
4 cash transfers to transfer currency to co-conspirators living in other countries.

5        536. Drug traffickers commonly have in their possession, on their person, and at  
6 their residences and/or in their storage units, firearms and other weapons that are used to  
7 protect and secure a drug trafficker's property.

8        537. Drug traffickers use mobile electronic devices including cellular telephones  
9 and other wireless communication devices to conduct their illegal trafficking business.  
10 As described below, such equipment often contains evidence of these illegal activities.

11        538. Traffickers of controlled substances commonly maintain addresses,  
12 vehicles, or telephone numbers that reflect names, addresses, vehicles, and/or telephone  
13 numbers of their suppliers, customers, and associates in the trafficking organization, and  
14 it is common to find drug traffickers keeping records of said associates in cellular  
15 telephones and other electronic devices. Traffickers often maintain cellular telephones  
16 for ready access to their clientele and to maintain their ongoing narcotics business.  
17 Traffickers frequently change their cellular telephone numbers to avoid detection by law  
18 enforcement, and it is common for traffickers to use more than one cellular telephone at  
19 any one time.

20        539. Drug traffickers use cellular telephones as a tool or instrumentality in  
21 committing their criminal activity. They use them to maintain contact with their  
22 suppliers, distributors, and customers. They prefer cellular telephones because, first, they  
23 can be purchased without the location and personal information that landlines require.  
24 Second, they can be easily carried to permit the user maximum flexibility in meeting  
25 associates, avoiding police surveillance, and traveling to obtain or distribute drugs.  
26 Third, they can be passed between members of a drug conspiracy to allow substitution  
27 when one member leaves the area temporarily. Since cellular phone use became  
28 widespread, every drug dealer I have interacted with has used one or more cellular

1 telephones for his or her drug business. I also know that it is common for drug traffickers  
2 to retain in their possession phones that they previously used, but have discontinued  
3 actively using, for their drug trafficking business. Based on my training and experience,  
4 the data maintained in a cellular telephone used by a drug dealer is evidence of a crime or  
5 crimes. This includes the following:

6 a. The assigned number to the cellular telephone (known as the mobile  
7 directory number or MDN), and/or the identifying telephone serial number  
8 (Electronic Serial Number (ESN), Mobile Identification Number (MIN),  
9 International Mobile Subscriber Identity (IMSI) number, or International Mobile  
10 Equipment Identity (IMEI) number) are important evidence because they reveal  
11 the service provider, allow agents to obtain subscriber information, and uniquely  
12 identify the telephone. This information can be used to obtain toll records, to  
13 identify contacts by this telephone with other cellular telephones used by co-  
14 conspirators, to identify other telephones used by the same subscriber or purchased  
15 as part of a package, and to confirm if the telephone was contacted by a  
16 cooperating source.

17 b. The stored list of recent received calls and sent calls is important evidence.  
18 It identifies telephones recently in contact with the telephone user. This is  
19 valuable information in a drug investigation because it will identify telephones  
20 used by other members of the organization, such as suppliers, distributors and  
21 customers, and it confirms the date and time of contacts. If the user is under  
22 surveillance, it identifies what number he called during or around the time of a  
23 surveilled drug transaction or meeting. Even if a contact involves a telephone user  
24 not part of the conspiracy, the information is helpful (and thus is evidence)  
25 because it leads to friends and associates of the user who can identify the user,  
26 help locate the user, and provide information about the user. Identifying a  
27 defendant's law-abiding friends is often just as useful as identifying his drug-  
28 trafficking associates.

1 c. Stored text messages are important evidence, similar to stored numbers.  
2 Agents can identify both drug associates, and friends of the user who likely have  
3 helpful information about the user, his location, and his activities.

4 d. Photographs on a cellular telephone are evidence because they help identify  
5 the user, either through his or her own picture, or through pictures of friends,  
6 family, and associates that can identify the user. Pictures also identify associates  
7 likely to be members of the drug trafficking organization. Some drug traffickers  
8 photograph groups of associates, sometimes posing with weapons and showing  
9 identifiable gang signs. Also, digital photos often have embedded "geocode"  
10 information within them. Geocode information is typically the longitude and  
11 latitude where the photo was taken. Showing where the photo was taken can have  
12 evidentiary value. This location information is helpful because, for example, it  
13 can show where coconspirators meet, where they travel, and where assets might be  
14 located

15 e. Stored address records are important evidence because they show the user's  
16 close associates and family members, and they contain names and nicknames  
17 connected to phone numbers that can be used to identify suspects.

18 540. It is common for drug dealers to possess narcotics, drug paraphernalia, and  
19 other items that are associated with the sale and use of controlled substances such as  
20 scales, containers, cutting agents/substances, and packaging materials in their residences,  
21 stash houses, storage units, garages, outbuildings and/or vehicles on their property.

22 541. Drug traffickers commonly have in their possession, that is, on their person,  
23 at their residences, stash houses, storage units, garages, outbuildings and/or vehicles,  
24 firearms, and other weapons, which are used to protect and secure their property.

25 542. Drug distributors frequently try to conceal their identities by using  
26 fraudulent names and identification cards. Once identities have been created or stolen  
27 from other individuals, drug traffickers use those identifications to falsify records such as  
28 DOL records and phone records to evade detection by law enforcement.

1        543. It is a common practice for drug traffickers to maintain records relating to  
2 their drug trafficking activities in their residences, stash houses, storage units, garages,  
3 outbuildings and/or vehicles. Because drug traffickers in many instances will “front”  
4 (i.e., sell on consignment) controlled substances to their clients, or alternatively, will be  
5 “fronted” these items from their suppliers, such record keeping is necessary to keep track  
6 of amounts paid and owed, and such records will also be maintained close at hand so as  
7 to readily ascertain current balances. These records include “pay and owe” records to  
8 show balances due for drugs sold in the past (pay) and for payments expected (owe) as to  
9 the trafficker’s suppliers and distributors, telephone and address listings of clients and  
10 suppliers, and records of drug proceeds. These records are commonly kept for an  
11 extended period.

12        544. Drug traffickers maintain books, records, receipts, notes, ledgers, airline  
13 tickets, money orders, and other papers relating to the transportation and distribution of  
14 controlled substances. These documents, whether in physical or electronic form, are  
15 maintained where the traffickers have ready access to them. These documents include  
16 travel records, receipts, airline tickets, auto rental agreements, invoices, and other  
17 memorandum disclosing acquisition of assets and personal or business expenses. I also  
18 know that such records are frequently maintained in narcotics traffickers’ residences,  
19 stash houses, storage units, garages, outbuildings and/or vehicles.

20            **X. REQUEST FOR EARLY EXECUTION OF WARRANTS**

21        545. Based upon physical and electronic surveillance observed by agents during  
22 the course of this investigation, several members of the CASTRO DTO appear to have  
23 employment that requires them to leave before or around 6 a.m. from their residences. I  
24 am therefore requesting authorization to serve the requested search warrants at 5 a.m. to  
25 ensure the apprehension of the CASTRO DTO members believed to be in residence at the  
26 locations mentioned throughout this Affidavit. Additionally, it is safer for both agents  
27 and suspects when agents execute such warrants in a preplanned tactical entry while the  
28 suspects are asleep in bed, away from weapons.

**XI. CONCLUSION**

546. On November 29, 2018, a grand jury sitting in the Western District of Washington returned a sealed Indictment against 31 members of the CASTRO DTO, *United States v. Carlos Eduardo Lopez Hernandez, et al.*, CR18-5579RBL, including many of the individuals whose residences and/or vehicles I am seeking authorization to search.

547. This Affidavit is submitted in support of an application to search 48 specific locations and 35 particular vehicles (in addition to other vehicles found within the curtilage of the 48 specified locations), more fully described in Attachments A, and A1-A84. Again, I am requesting permission to execute these search warrants prior to 6:00 a.m., in order to preserve evidence and ensure the subjects of this investigation do not have the opportunity to flee from prosecution. Based on intercepted phone calls and controlled purchases, such as those described in this Affidavit, as well as continued physical and electronic surveillance, I believe the locations and vehicles described in this Affidavit have been and continue to be used by members of the CASTRO DTO to further their drug trafficking and money laundering crimes in violation of Title 21, United States

//

//

//

//

//

//

//


//

//

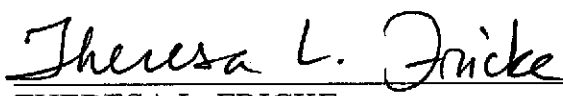
//



1 Code, Sections 841(a)(1), 843(b) and 846, and Title 18, United States Code, Sections  
2 924(c), 1956, and 1957, and that evidence of such, as described more particularly in  
3 Attachment B, will be found at these locations and in these vehicles.  
4  
5

6   
7 JEREMY TAN  
8 Special Agent  
9 Drug Enforcement Administration

10 SUBSCRIBED and SWORN TO before me this 3<sup>rd</sup> day of December, 2018.

11   
12 THERESA L. FRICKE  
13 UNITED STATES MAGISTRATE  
14 JUDGE  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

## **ATTACHMENT A**

### **Locations and vehicles to be searched**

This warrant authorizes the government to search the following locations and vehicles for evidence and/or fruits of the commission of the following crimes, as further described in Attachment B hereto: distribution and possession with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), and conspiracy to commit these offenses in violation of Title 21, United States Code, Section 846; use of a communications facility in furtherance of a felony drug offense in violation of Title 21, United States Code, Section 843(b); importation of controlled substances, in violation of Title 21, United States Code, Section 952; possession of a firearm in furtherance of a drug trafficking crime, in violation of Title 18, United States Code, Section 924(c), and laundering of monetary instruments in violation of Title 18, United States Code, Sections 1956 and 1957.

With respect to the locations to be searched, where that location is an apartment or multi-family residence, the search is to include all rooms within the residence, any assigned garages or storage rooms, attached or detached, and any vehicles found within such an assigned garage or in any assigned parking space, whether or not particularly named among the vehicles for which specific search authorization is sought.

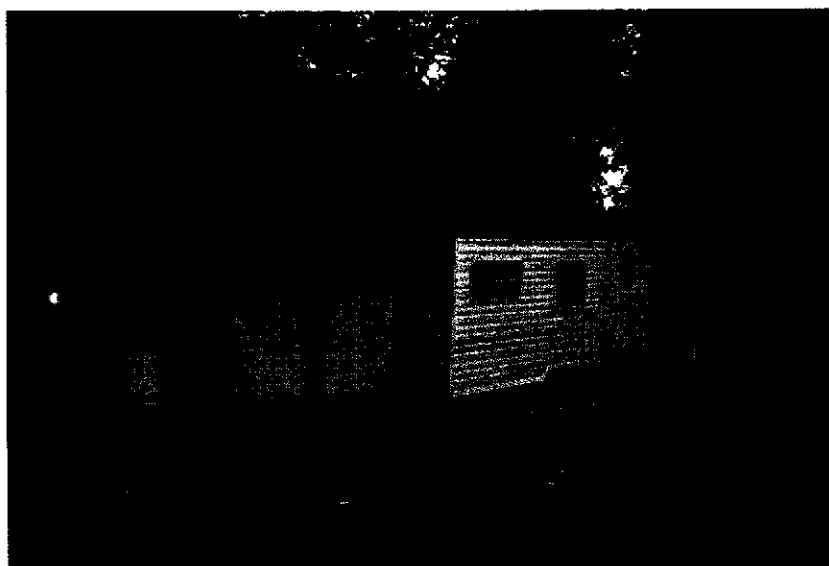
With respect to the locations to be searched, where that location is a single-family residence, the search is to include all rooms within the residence, any garages or storage rooms, attached or detached, and any vehicles found within the curtilage of the residence, whether or not particularly named among the vehicles for which specific search authorization is sought.

Where the location to be searched is a business, the search is to include all rooms within the business, and any garages or storage units, attached or detached, within the curtilage of the business.

### ATTACHMENT A1

Suspected drug and money stash location and prior residence of Carlos Eduardo LOPEZ Hernandez: 22025 100th Ave. SE, Kent, Washington.

**Physical Description:** White "Dutchmen Classic" trailer with green stripes located in the center of the fenced property addressed "22025." There is a rolling gate with the numbers "22025" painted on a piece of diamond plate metal affixed to the gate. The residence is visible as soon as the gate is opened and the property is accessed. There is also a red work shed and blue residence located on the property.



## ATTACHMENT A2

Residence of Carlos Eduardo LOPEZ Hernandez: **Pasa Fino II Apartments, 12212 SE 310th St., Apt AA303, Auburn, Washington.**

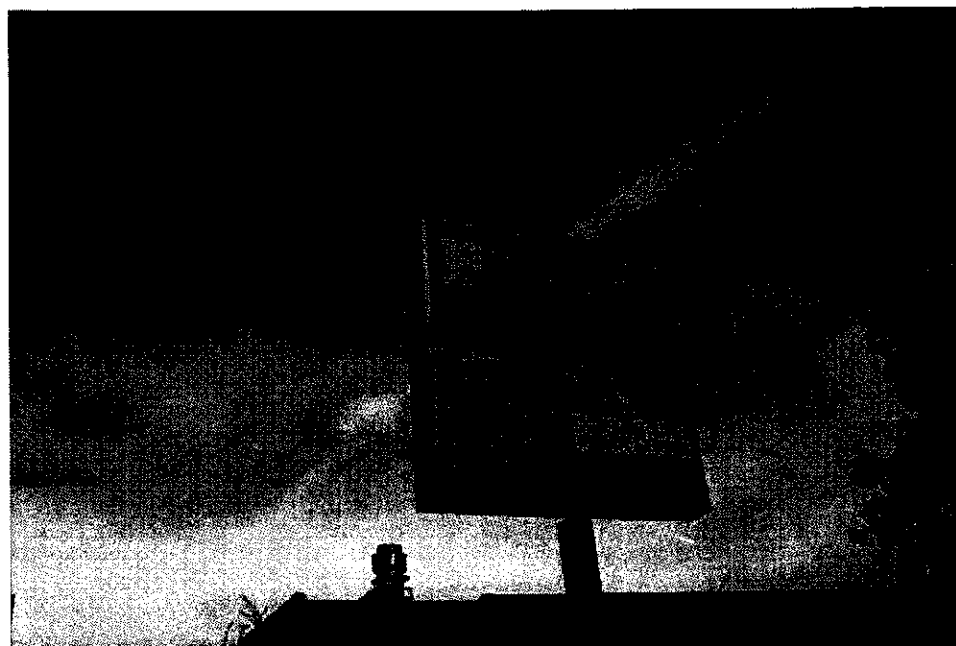
**Physical Description:** Apartment AA303 of the multi-dwelling apartment complex named “Pasa Fino II Apartments,” tan with brown trim. The apartment is the only apartment on the third floor of the AA building. The apartment is at the top right of the AA building stairwell of the when facing the stairwell. The stairwell has “AA, 303, 203, 103” written vertically on a red placard affixed to a pillar on the right side of the stairwell.



### ATTACHMENT A3

Business location for Cindy SOLTERO Jimenez: **Soltero's Market Mexican Store, 24202 104th Ave. SE Unit 104, Kent, Washington.**

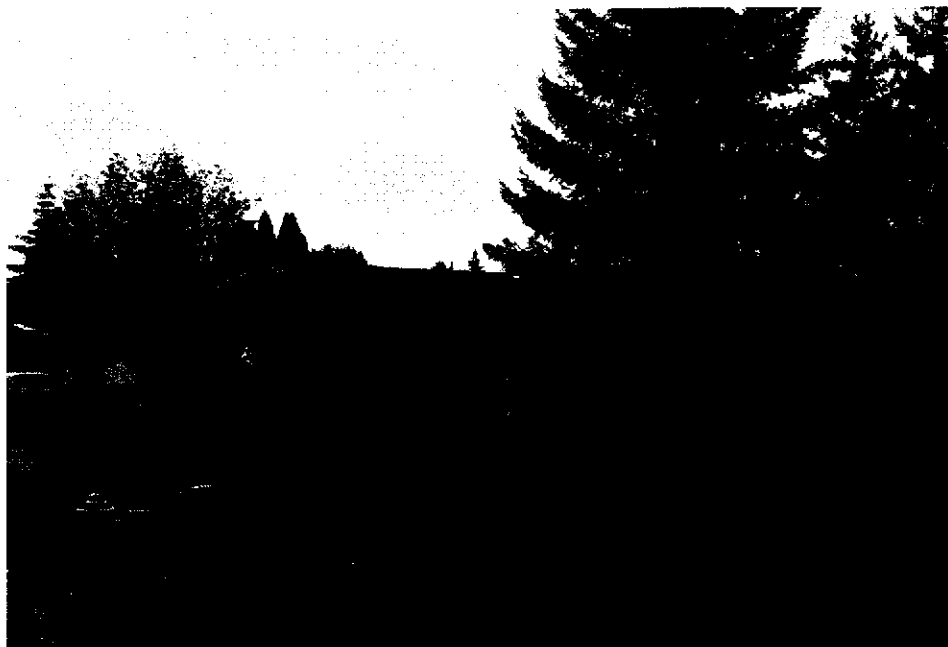
**Physical Description:** A place of business with tan exterior, dual glass front door with black metal security bars, a sign above the doors in red and green lettering on a white background that reads "SOLTERO'S MARKET MEXICAN GROCERY," and the numbers "24202" affixed horizontally above the sign,



#### **ATTACHMENT A4**

**Residence of Cindy SOLTERO Jimenez: 31600 126th Ave. SE, Space 106, Auburn, Washington.**

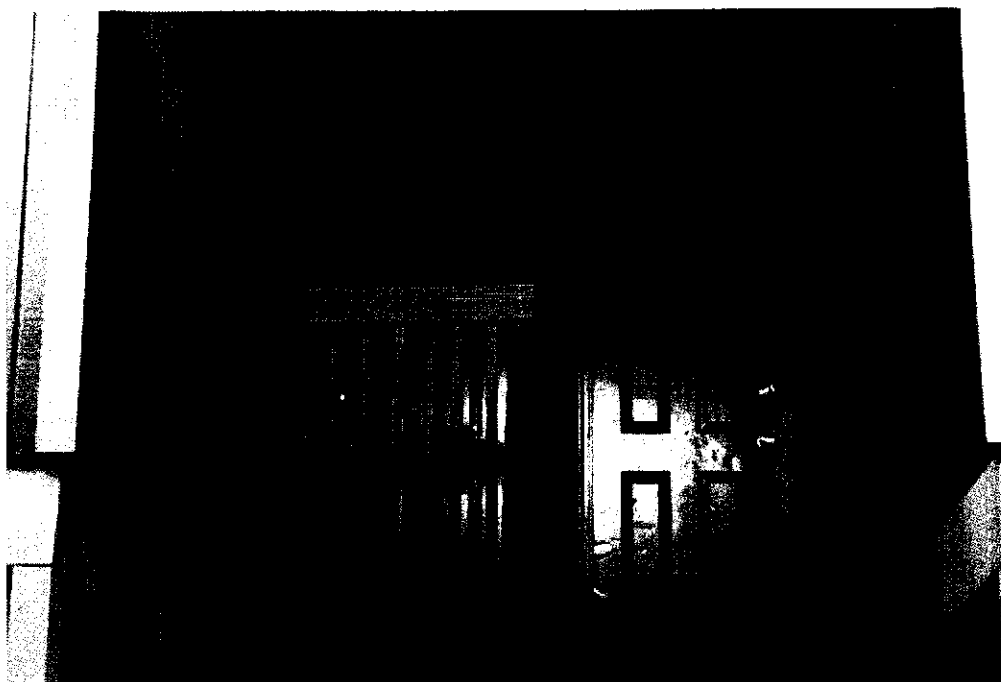
**Physical Description:** Single level single family mobile home located in the "College Place Mobile Home Park," greenish brown with white trim, white door, dark shingle roof, the numbers "106" affixed diagonally to the right of the front door when facing the dwelling.



### ATTACHMENT A5

Residence of Jesus Rene SARMIENTO Valenzuela: 10545 SE 238th St., Unit 8, Kent, Washington.

**Physical Description:** Unit 8 of the multi-dwelling apartment complex named "Twin Crest Apts," brown with tan trim. The numbers "10545" affixed horizontally above the name of the apartment complex, Unit 8 located at the top left of a stairwell when facing the stairwell with the number "8" affixed to the center of the door.





### ATTACHMENT A6

Residence of Jaime HEREDIA Castro: 350 S. Burlington Blvd., Burlington, Washington.

**Physical Description:** Two level residential dwelling, gray in color with blue trim, white front door, with the numbers “350” affixed horizontally to the right of the front door when facing the residence. There is a large deck on the front of the residence with as exterior stairway leading to the deck from the ground level.

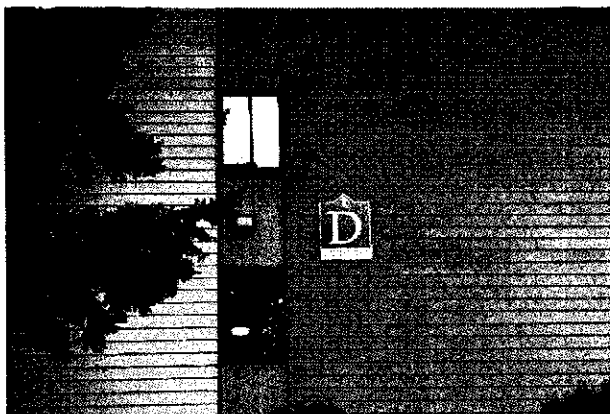
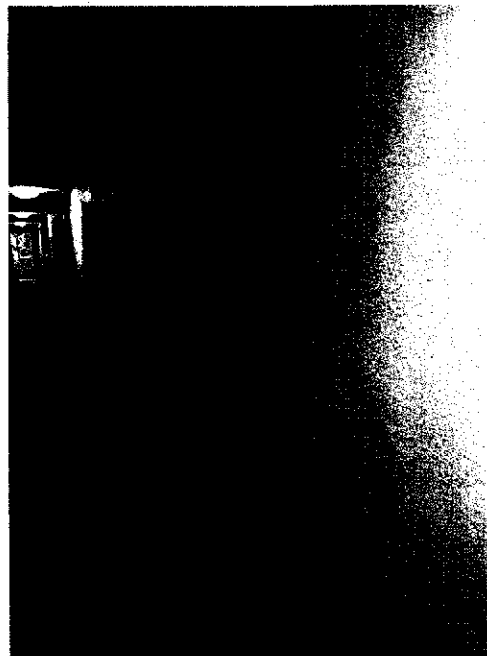


### ATTACHMENT A7

Residence of Juan AVILES Berrelleza: **La Mirage Apartments, 11247 SE 258th Pl., Apartment D306, Kent, Washington.**

**Physical Description:** Apartment 306 of the "D" building of the multi-dwelling apartment complex named "La Mirage Apartments," the address "11247 SE 258<sup>th</sup> Pl" and letter "D" affixed to a tan, gray, brown, and blue interior access only building.

Apartment 306 is located mid-hallway on the 3<sup>rd</sup> level of the building, the numbers "306" affixed to the door of the apartment.



### ATTACHMENT A8

Residence of Hector Manuel URIAS Moreno: 428 105th St. SW, Everett, Washington.

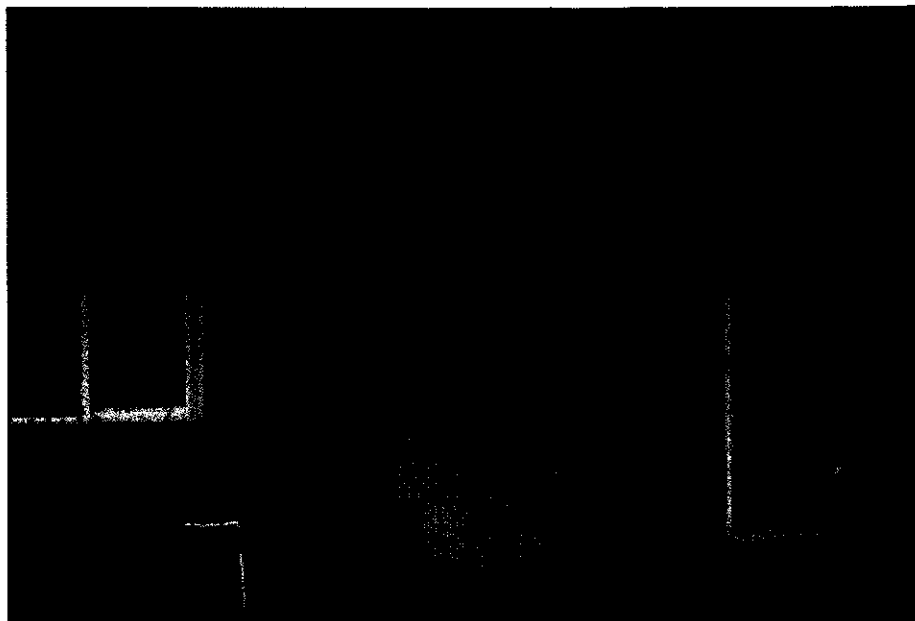
**Physical Description:** Two story single family dwelling, tan in color with white trim, with black shingle roof, with numbers "428" affixed vertically to the right porch post when facing the residence, with an addition currently under construction.



### **ATTACHMENT A9**

**Suspected Stash Location for Hector Manuel URIAS Moreno: 8503 8th Ave. W, Everett, Washington.**

**Physical Description:** Single story, single family dwelling, brown and tan with white window frames and a dark shingle roof, tan door with the numbers "8503" affixed horizontally to the right side of the front door when facing the residence.



### ATTACHMENT A10

Residence of Jorge VALENZUELA Armenta: 4416 S 137th St., Tukwila, Washington.

**Physical Description:** Brown single level single family dwelling with white trim, white front door, black shingle roof, the numbers "4416" affixed vertically to the left front porch post when facing the residence.



## ATTACHMENT A11

Residence of Michael John and Esther La Rena SCOTT: 8024 150th St. SE,  
Snohomish, Washington.

**Physical Description:** Two story single family dwelling, brown and tan with white trim and stone fascia, brown front door, the numbers “8024” affixed vertically on the right side of the garage when facing the residence, multiple surveillance cameras attached to the residence.



## ATTACHMENT A12

Business of Michael John and Esther La Rena SCOTT: **Wired in Networks**  
**18421 Highway 99, Suite B, Lynnwood, Washington.**

**Physical Description:** Business located in a small business strip mall, glass front, tinted glass door, with "B" and "WIRED IN NETWORKS" printed horizontally on the glass door, a large sign on the roof of the business that reads "WIRED IN NETWORKS".

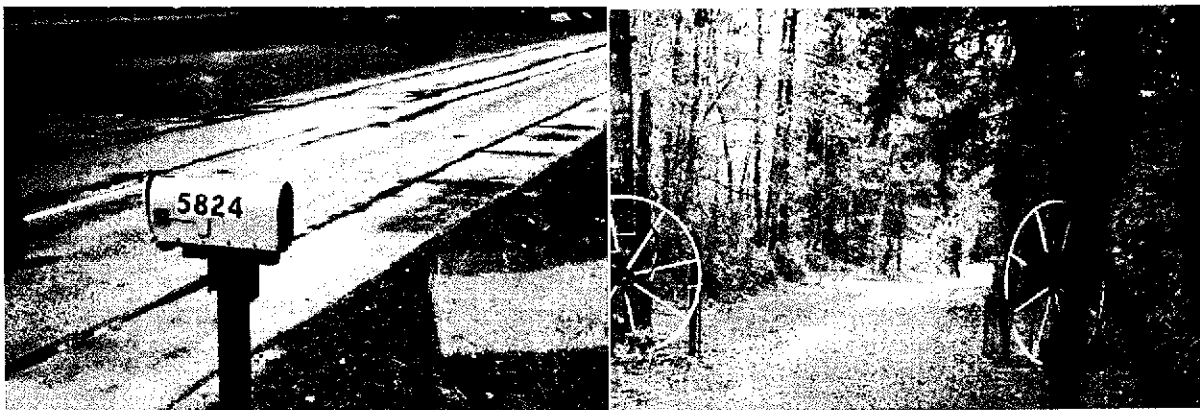




### ATTACHMENT A13

Residence of Gerald Keith RIGGINS: 5824 152<sup>nd</sup> St E, Puyallup, Washington.

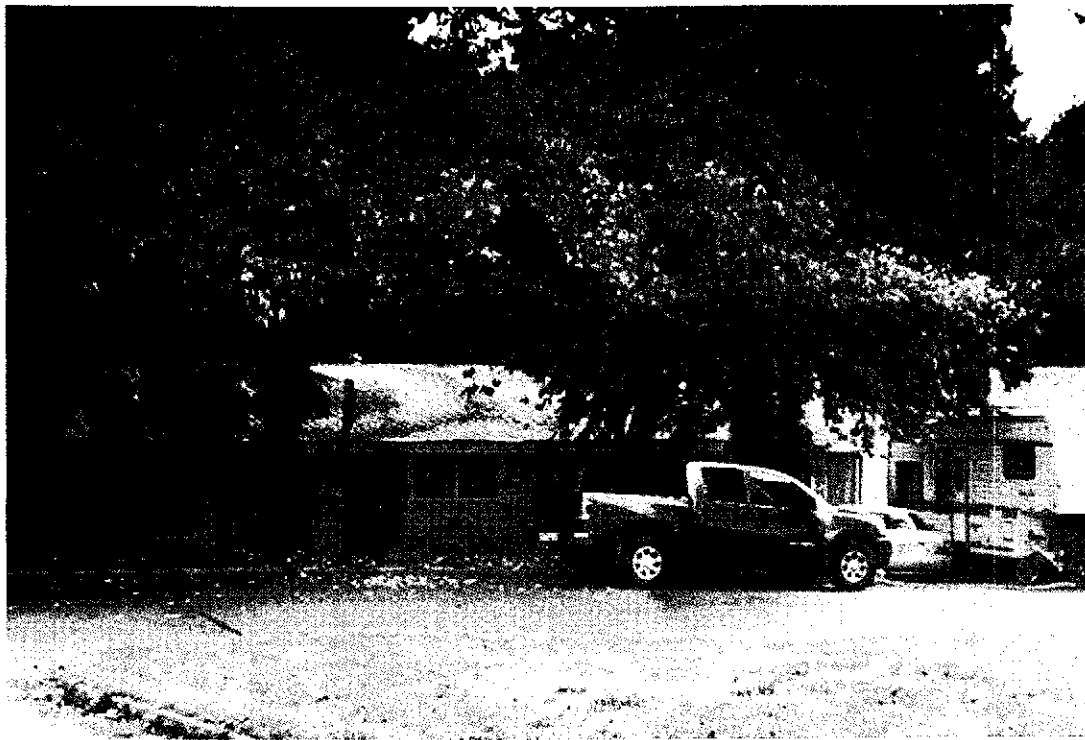
**Physical Description:** One level single-family residence, yellow with white trim, white front door, and black shingle roof at the end of a long gravel driveway, the numbers “5824” affixed to the mailbox at the beginning of the driveway.



### ATTACHMENT A14

Residence of Julian Gauge ORDONEZ: 34402 28th Pl. SW Federal Way, Washington.

**Physical Description:** Two story single family dwelling, tan with white trim, white front door, dark shingle roof, the numbers "34402" affixed vertically to the right of the front door when facing the residence, shed under construction in the back yard.



### ATTACHMENT A15

Residence of Julian Gauge ORDONEZ: 34235 18th Pl. S, Federal Way,  
Washington.

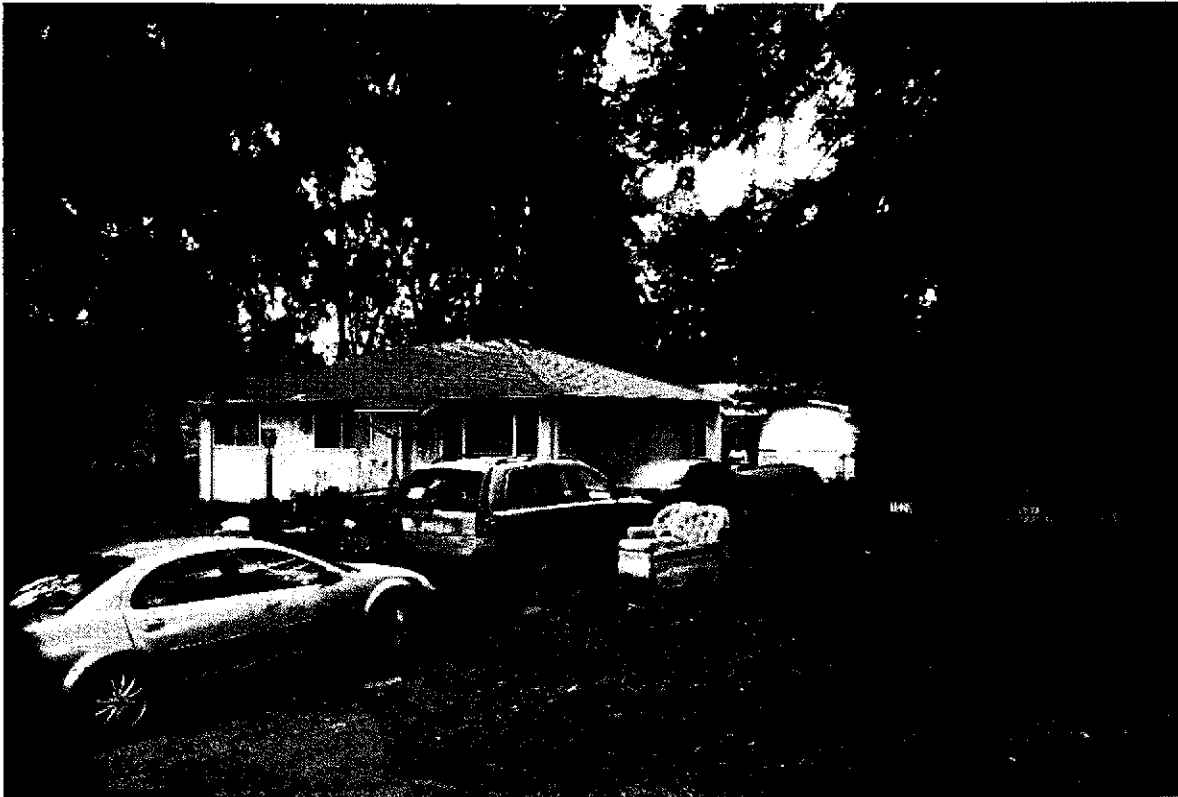
**Physical Description:** Single story, beige-colored residence with grey-colored roofing. The numbers "34235" appear horizontally on the left side of the residence, when facing it.



**ATTACHMENT A16**

**Residence of Monique GREEN: 1020 SW 305th St., Federal Way, Washington.**

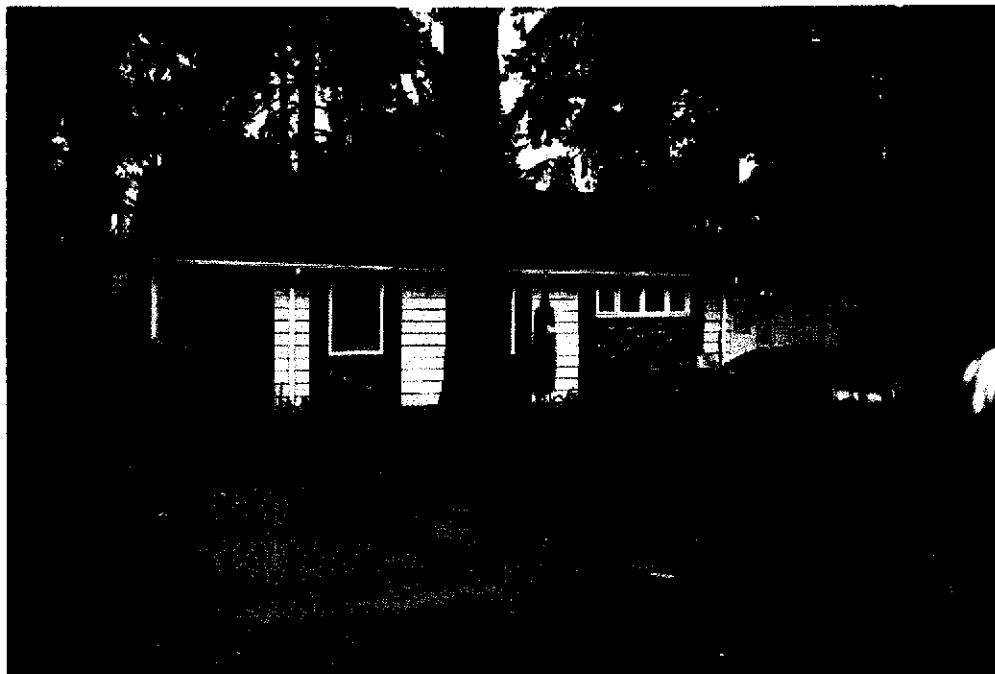
**Physical Description:** Yellow single-family dwelling with white trim and a dark colored shingle roof, the numbers "1020" affixed horizontally to the left side of the front door when facing the residence.



### ATTACHMENT A17

Residence of Rolando ESPINDOLA and Jessica JOHNSON: 314 N 133rd St.,  
Seattle, Washington.

**Physical Description:** Yellow single story single family dwelling with white and brown trim, brick fascia, brown shingle roof, and brown front door, the numbers "314" affixed horizontally to a black mailbox in front of the residence.



### ATTACHMENT A18

Stash location for Carlos Alejandro CASTRO Perez and Nicolas CISNEROS: **952 SW Campus Dr., Apt 26E-1, Federal Way, Washington.**

**Physical Description:** Building 26, unit E-1 of the multi-dwelling apartment complex "GLEN PARK," beige building with tan trim, lower left side door when facing the building; "26" affixed to the right side of the stairwell, "E-1, E-2, E-3, F-1, F-2, and F-3" affixed to right side of the building.

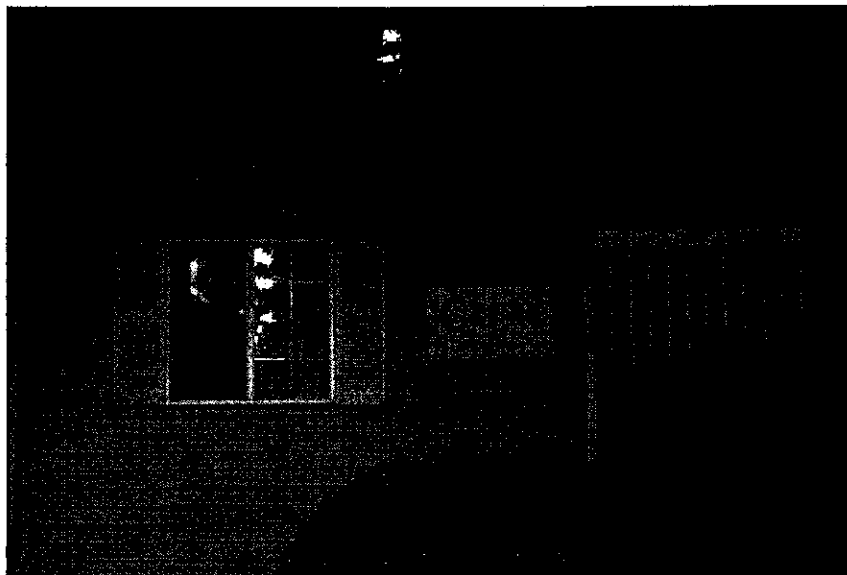


**ATTACHMENT A19**

**Residence of Carlos Alejandro CASTRO Perez: Fox Run Apartments, 34726 2nd Lane S, Unit C40, Federal Way, Washington.**

**Physical Description:** Apartment 40 of the “C” building of the “Fox Run Apartments” multi -family residential building. The building is yellow in color with white trim. A placard that reads “Fox Run Apartments C 31-48 34726 2nd Lane So.” is attached to the building where Apartment 40 is located. Apartment 40 is located on the bottom level, right side when facing the building, with the numbers “40” affixed horizontally to the white door.

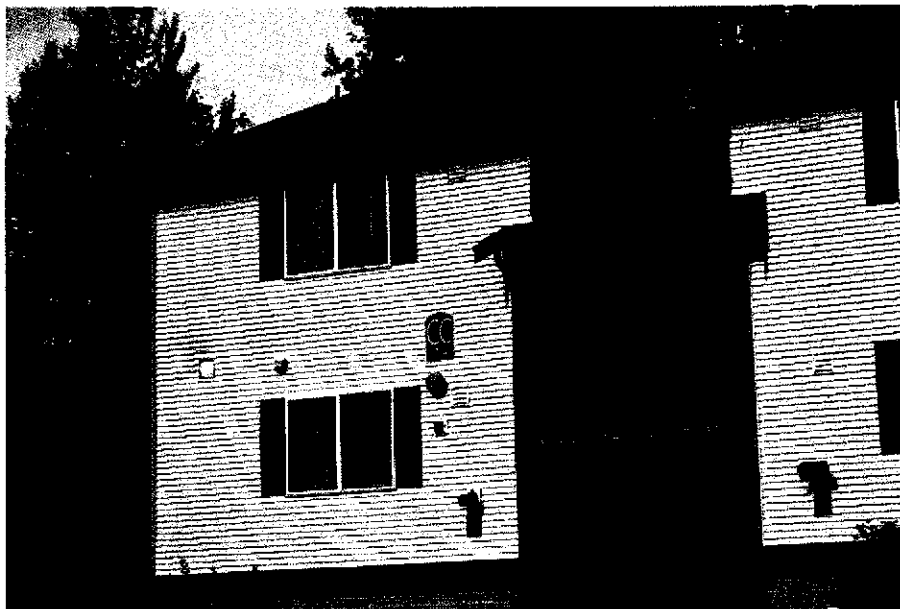
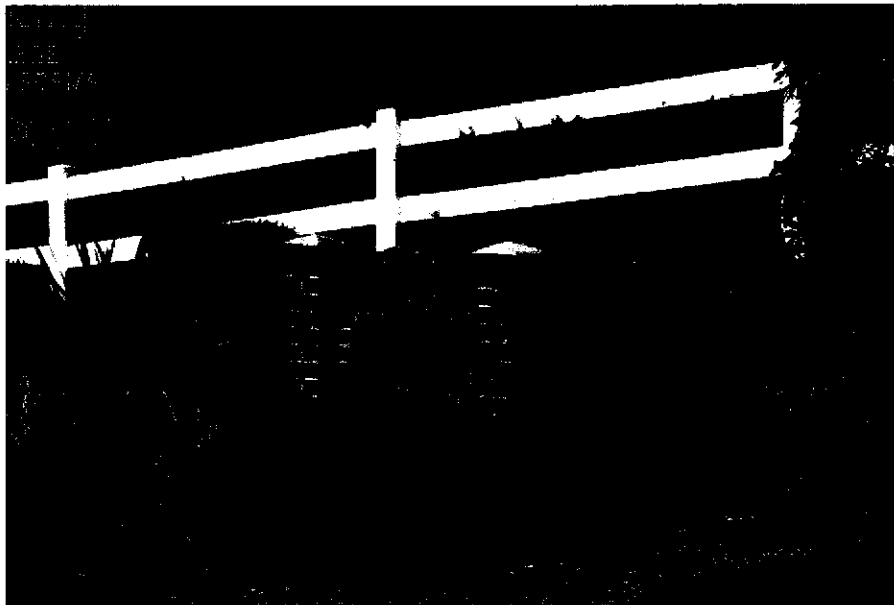




## ATTACHMENT A20

Residence of Emmanuel REYES Perez: 2136 S 260th St., Apartment CC-201,  
Des Moines, Washington.

**Physical Description:** Apartment 201 of the "CC" building of the "Saddlebrook Apartments" multi -family residential building. The building is white in color with dark green trim. A placard that reads "CC 2136" Is attached to the building where apartment #201 is located. Apartment 201 is located on the second level, left side when facing the building, with the numbers "201" affixed horizontally to the white door.



### ATTACHMENT A21

Residence of Karen SURYAN: 210 NW 107th St., Seattle, Washington.

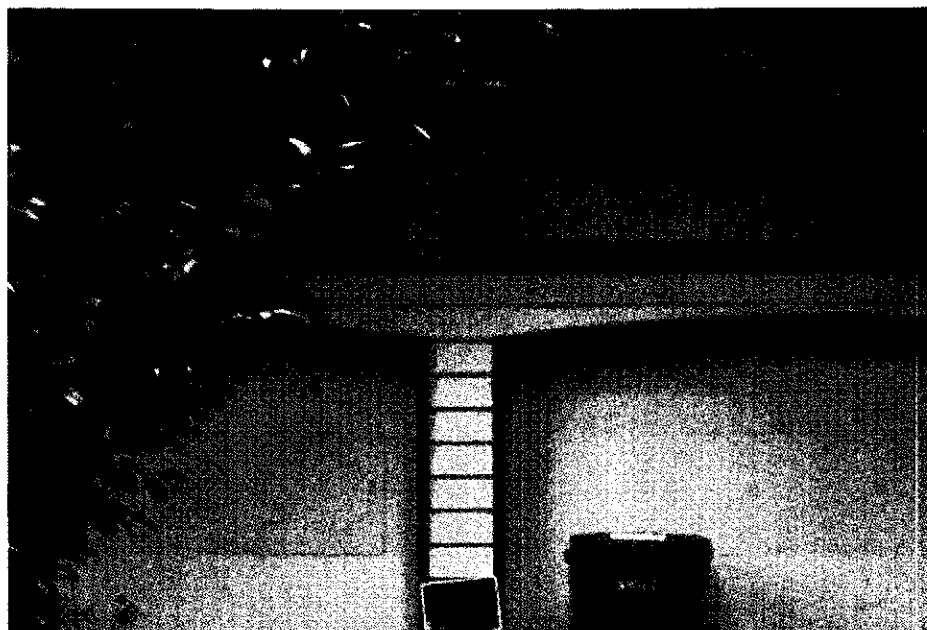
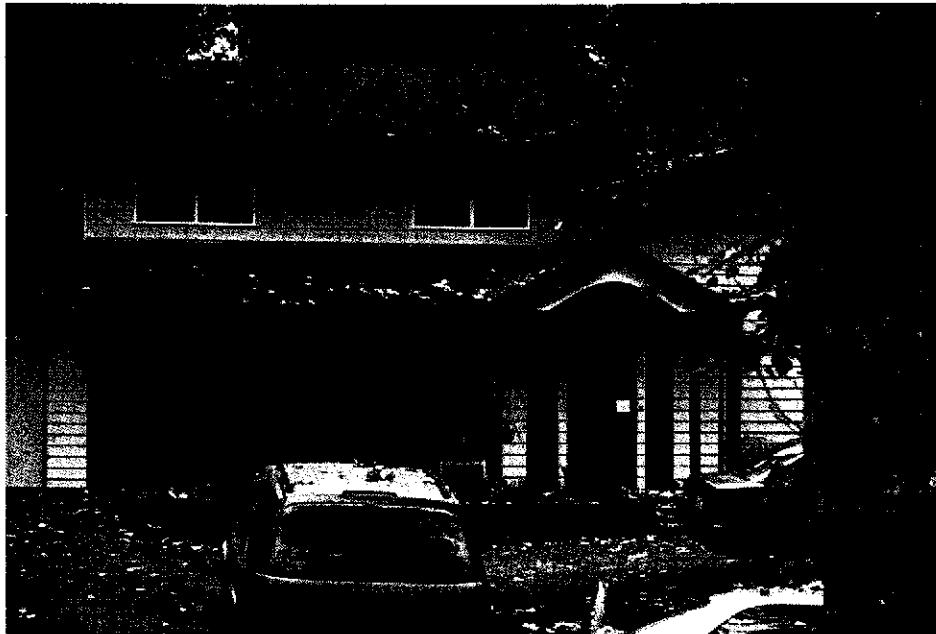
**Physical Description:** Blue two level single family dwelling with white trim and shingle roof, white front door, the numbers "210" affixed horizontally to the right side of the front door when facing the residence.



## ATTACHMENT A22

Residence of Michael SURYAN: 16809 8th Ave. SW, Normandy Park, Washington.

**Physical Description:** Two level single family tan colored single family dwelling with brown trim, red front door, white garage door, black shingle roof, the numbers "16809" affixed horizontally above the garage door.



### ATTACHMENT A23

Residence of Orlando BARAJAS: 310 N Anacortes St., Burlington,  
Washington.

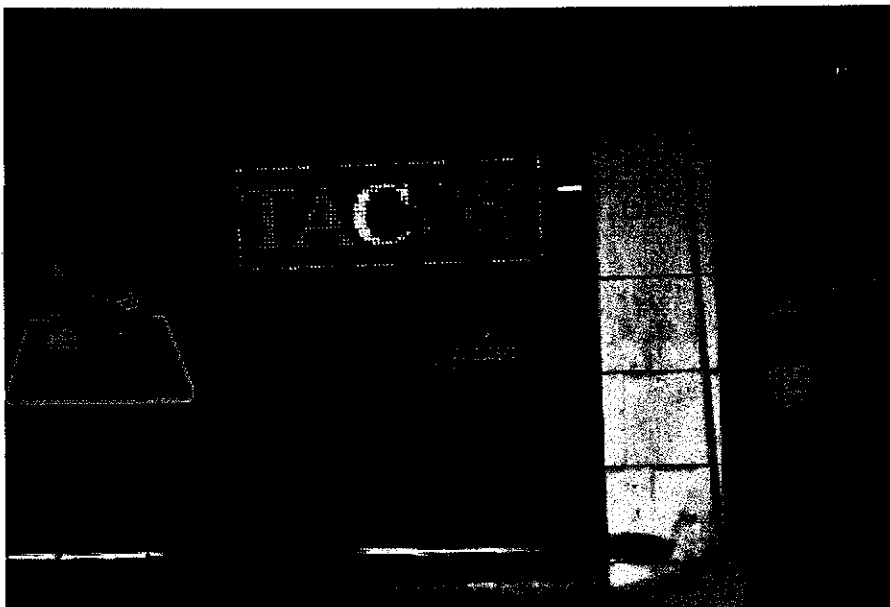
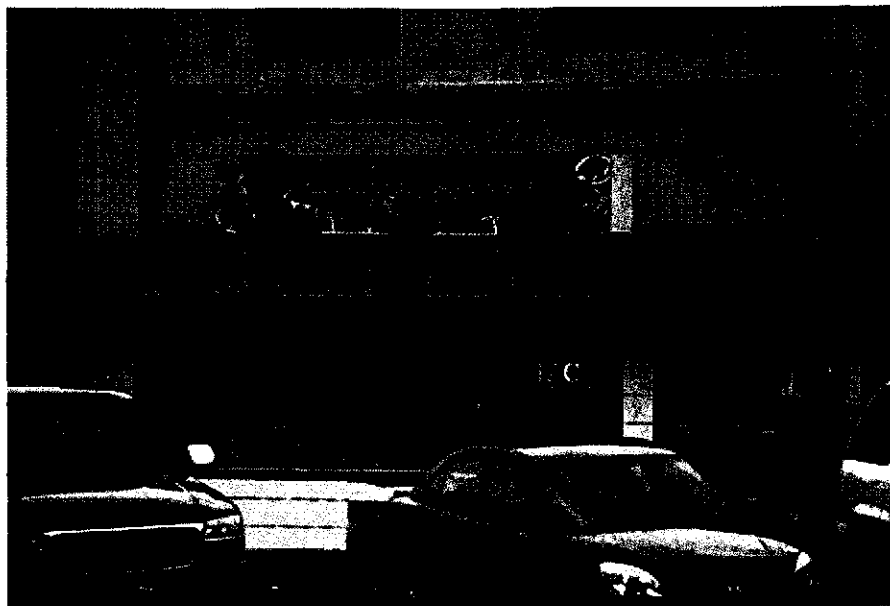
**Physical Description:** Two story single family dwelling, tan in color with white trim, with black shingle roof, with numbers "310" affixed horizontally above the front door, surrounded by a chain link fence.



#### ATTACHMENT A24

Business location for Orlando BARAJAS: **Taco El Antojito, 628 E Fairhaven Ave., Burlington, Washington.**

**Physical Description:** White storefront with "Tacos El Antojito" in red lettering on yellow background above the front window, red, white, and green lighted sign that reads "TACOS" and "OPEN" in the front window, numbers "628" affixed horizontally on right side of the door when facing the building.



**ATTACHMENT A25**

**Residence of Jose VELASCO: 506 Tiger Lane, Burlington, Washington.**

**Physical Description:** Single level, single family blue residential dwelling with blue trim and a white garage door, the numbers "506" affixed horizontally to the left of the garage door when facing the residence.

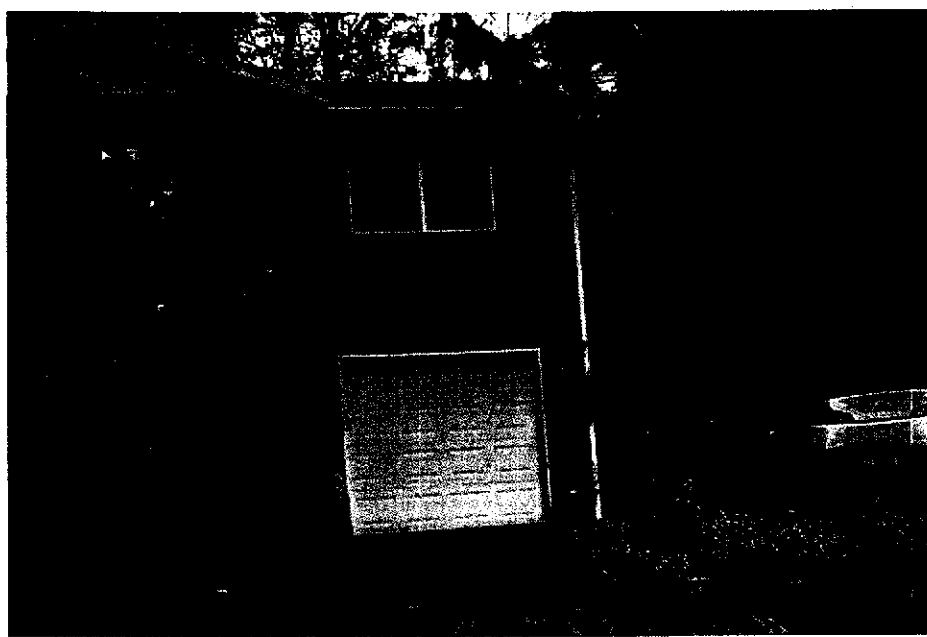
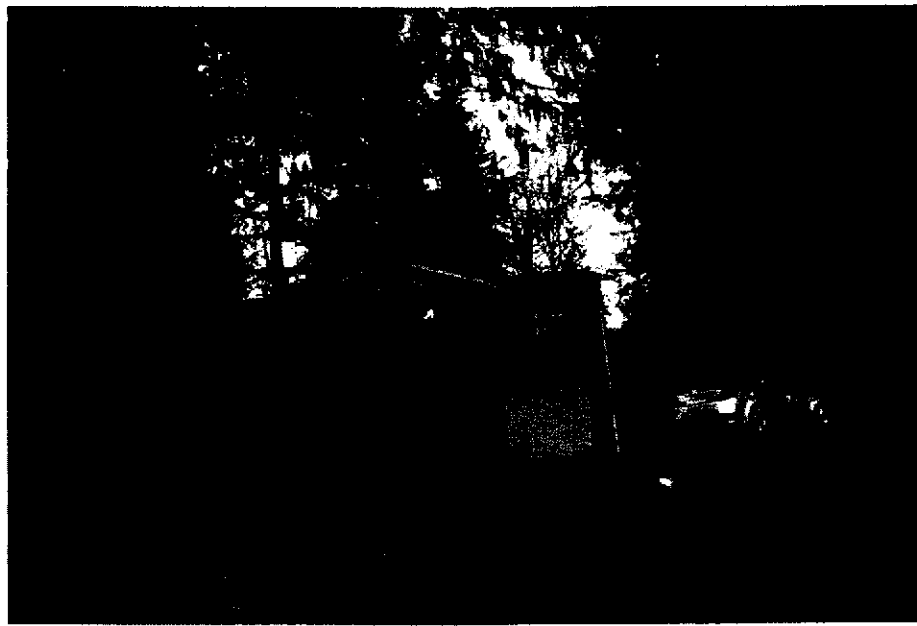




### ATTACHMENT A26

Residence of Brian LIVELY: 8123 71st Pl. SE, Snohomish, Washington.

**Physical Description:** Two level, single family red residential dwelling with white trim, a white garage door, a brown front door, and a black shingle roof, the numbers "8123" affixed horizontally above the garage door and vertically to the right of the front door when facing the residence.



### ATTACHMENT A27

Residence of Uriel ZELAYA: 28527 37th Pl. S, Auburn, Washington.

**Physical Description:** Two story, single family dwelling, tan with white trim, white front door, white garage door, and dark shingle roof, the numbers "28527" affixed horizontally to right side of the front door when facing the residence.



### ATTACHMENT A28

Residence of Omar VALTIERRA: 16508 SE 147th St., Renton, Washington.

**Physical Description:** Blue, two level, single family dwelling with black trim, white window frames, dual white front doors, brown shingle roof, and white garage door.



### ATTACHMENT A29

Residence of Jerry Austin RODRIGUEZ Jaime: 859 116th St, Tacoma, Washington.

**Physical Description:** Two level, single family home residential dwelling. Upper level is light blue/green-colored with a tan-colored lower level, which has an attached garage (white door). The numbers "859" are affixed vertically to the right of the garage door when facing the residence.



### **ATTACHMENT A30**

**Residence of Jake WILSON: 7111 193rd St. E, Spanaway, Washington.**

**Physical Description:** Single level, single family off-white colored residential dwelling with blue trim, white garage door, white front door with white security door, a black shingle roof, and the numbers "7111" affixed horizontally to the right of the garage door when facing the residence.



### **ATTACHMENT A31**

**Residence of Joshua MENDIOLA: a 5th wheel trailer parked at 21515 111th Ave. Court E, Graham, Washington.**

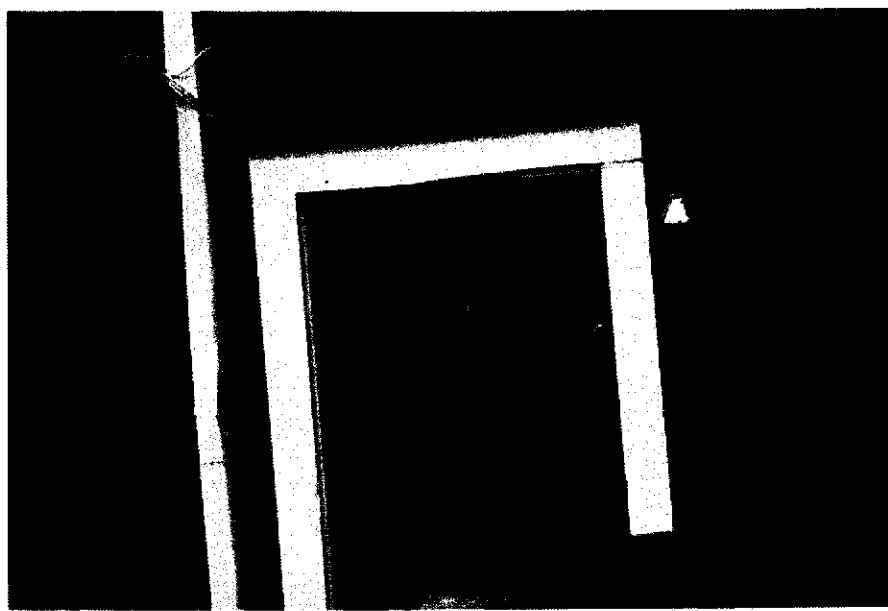
**Physical Description:** a white-colored 5<sup>th</sup> wheel trailer parked next to a light-colored, single story dwelling with dark-colored roofing.



### **ATTACHMENT A32**

**Residence of Allex and David HUBLY: 713 S Yakima Ave., Apartment 9, Tacoma, Washington.**

**Physical Description:** Gray four level multi family dwelling with white trim, Apartment "9" is located on alley (east) side of the building (not Yakima Ave. side), bottom left door when facing the building, the number "9" affixed to the door.

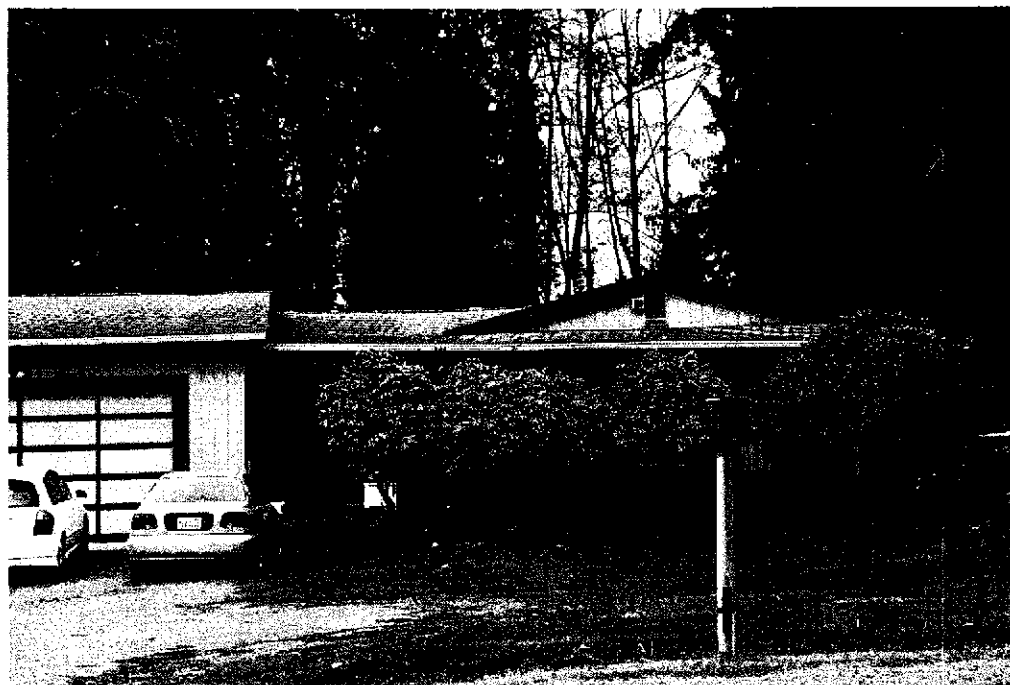




**ATTACHMENT A33**

**Residence of Charles JOSLYN: 8422 214th Ave. E, Bonney Lake, Washington.**

**Physical Description:** Tan-colored single story residence with dark brown trim and an attached garage.



### ATTACHMENT A34

Residence of Tim CRAWFORD: 3435 Auburn Way S, Apartment 38, Auburn, Washington.

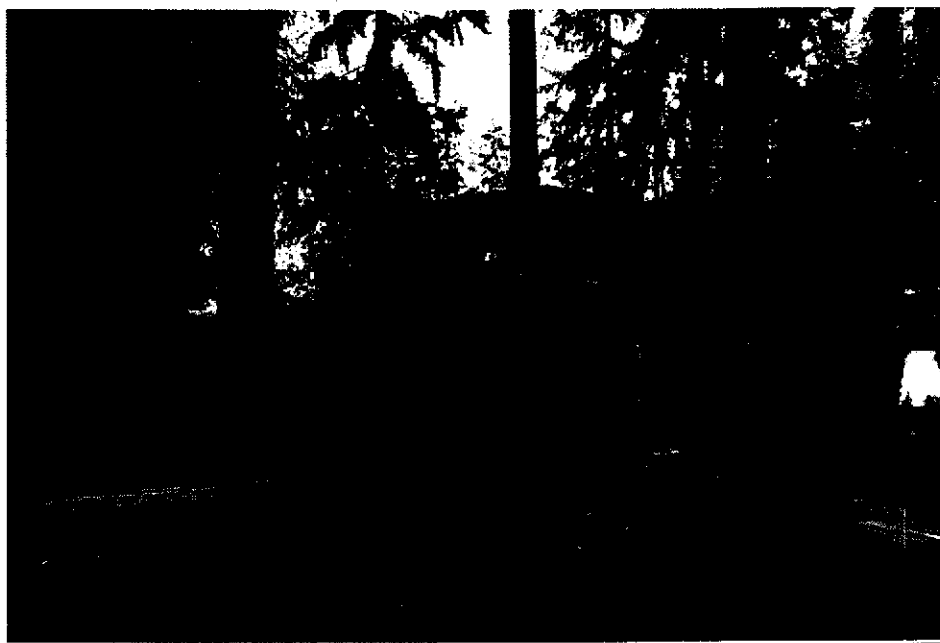
**Physical Description:** Apartment #38 in a yellow and tan multi-dwelling apartment complex, unit is located in the corner of the complex and has white storm and exterior doors, the numbers "38" affixed horizontally on the right side of the front door.



**ATTACHMENT A35**

Residence of Kurtis and Lindsay NEMEYER: 9119 114th St. E, Puyallup, Washington.

**Physical Description:** Light brown two level single family dwelling with a dark brown garage door and dual teal blue front doors, the numbers "9119 affixed horizontally above the front doors.



**ATTACHMENT A36**

**Residence of Natasha DJORDJEVIC: 1001 E 63rd St., Tacoma, Washington.**

**Physical Description:** Green single level single family dwelling with brown trim, tan front door, black shingle roof, the numbers "1001" affixed horizontally to the right side of the garage door when facing the residence.



**ATTACHMENT A37**

**Residence of Corey RILEY: 9121 Washington Hwy 162, Puyallup, Washington.**

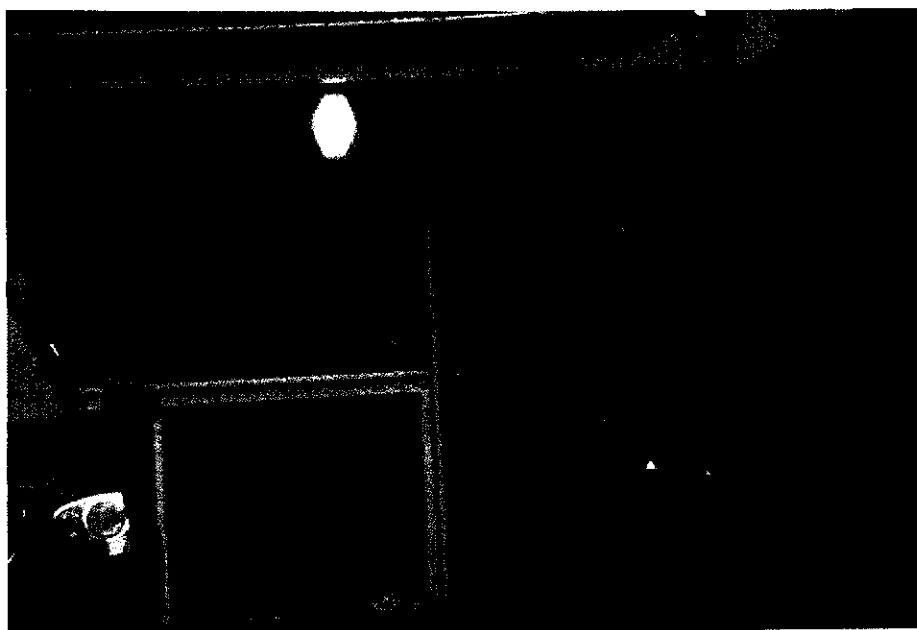
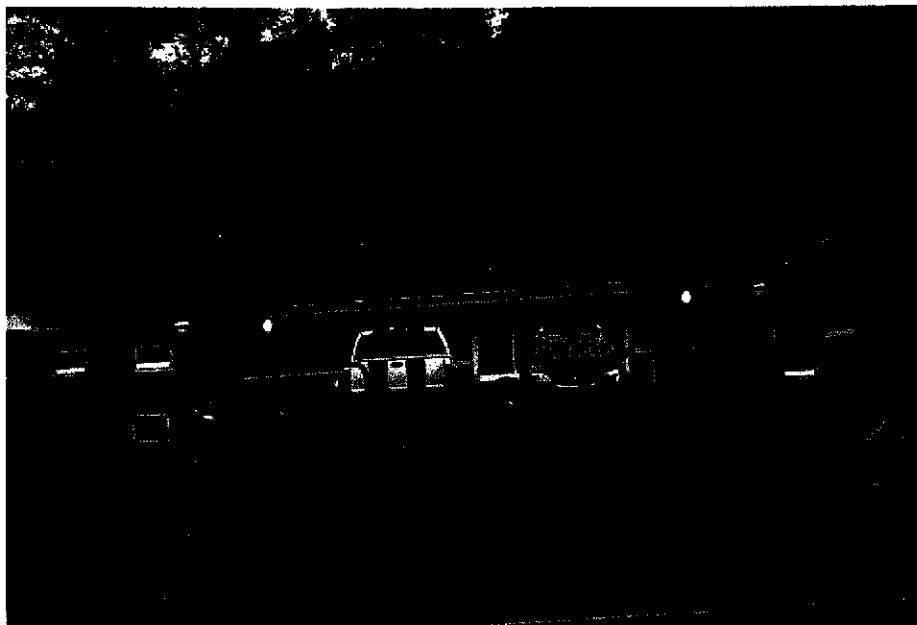
**Physical Description:** Light green single level single family mobile home with brown trim, white window frames, and a dark shingle, located behind a gate for "STORAGE INSIDE & OUTSIDE."



**ATTACHMENT A38**

**Residence of Julia CAMMEL: 7002 224th St. E, Graham, Washington.**

**Physical Description:** Single level single family dwelling, two-tone brown with white trim, tan front door, dark shingle roof, metal access gate, surrounded by a cedar fence, the numbers "7002" marked in black lettering on the mailbox in front of the residence.



**ATTACHMENT A39**

**Residence of Blake HYNEK: 1908 92nd Ave. E, Edgewood, Washington.**

**Physical Description:** Multi-level single family light-colored residential dwelling with a brown front door and a brown shingle roof. This residence is gated.

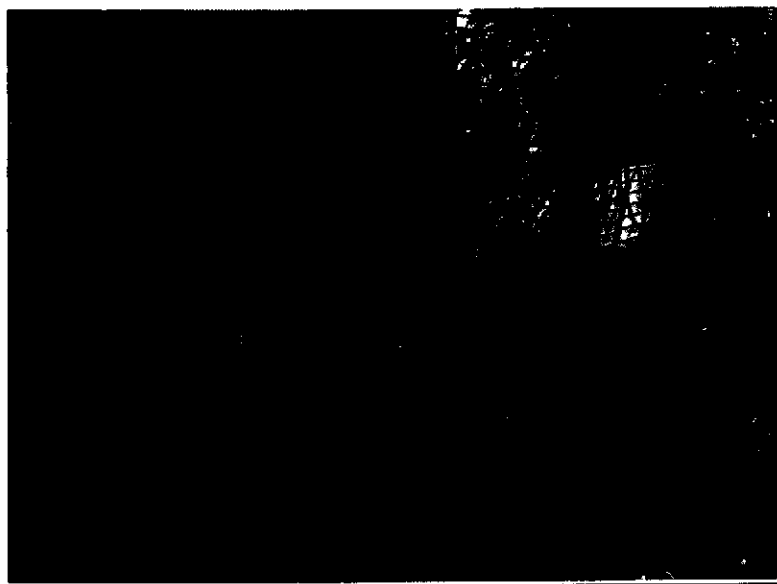




**ATTACHMENT A40**

**Residence of Larry SWEITZER: 75 Brookdale Lane, Apartment E102, Bremerton, Washington.**

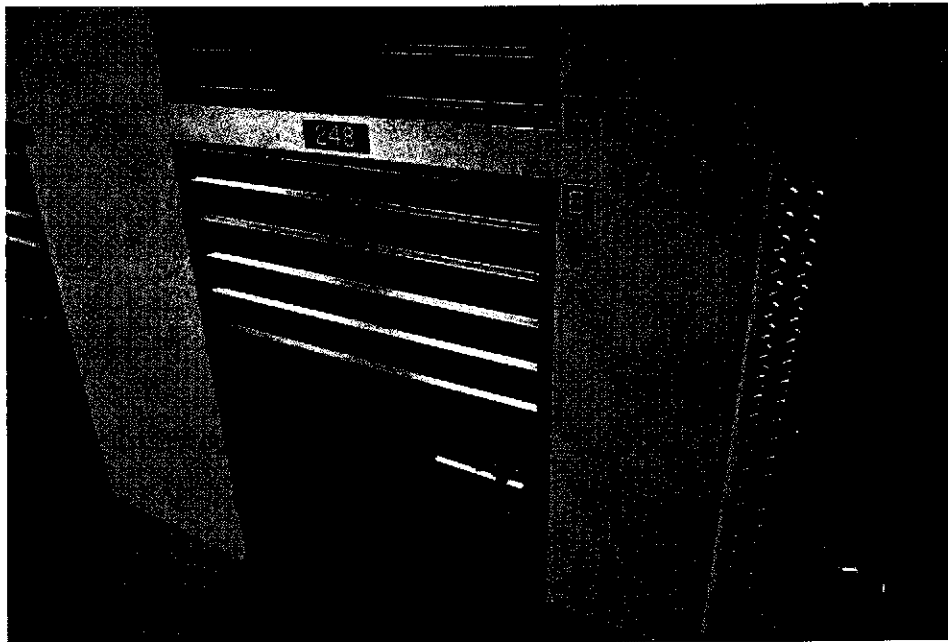
**Physical Description:** Apartment E102 of the multi-dwelling apartment complex named "Park Place Apartments," a grey building with white trim. The apartment is on the ground floor of the "75" building of the complex. The entryway to the apartment is a south facing door and is on the left side of the building as you view the building from NE Brookdale Lane.



### ATTACHMENT A41

Storage Unit of Gregory WERBER: Unit 248B at 1st Avenue Self Storage, 2400 1st Ave. South, Seattle, Washington.

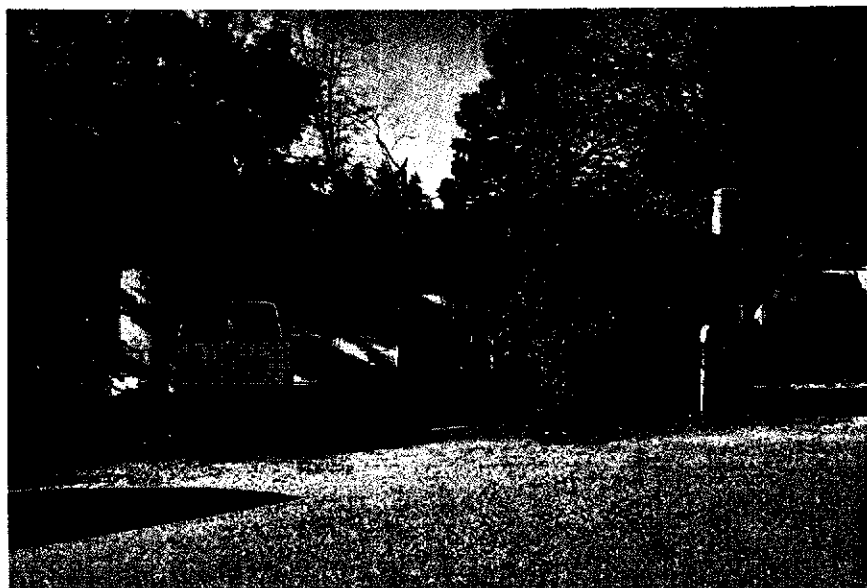
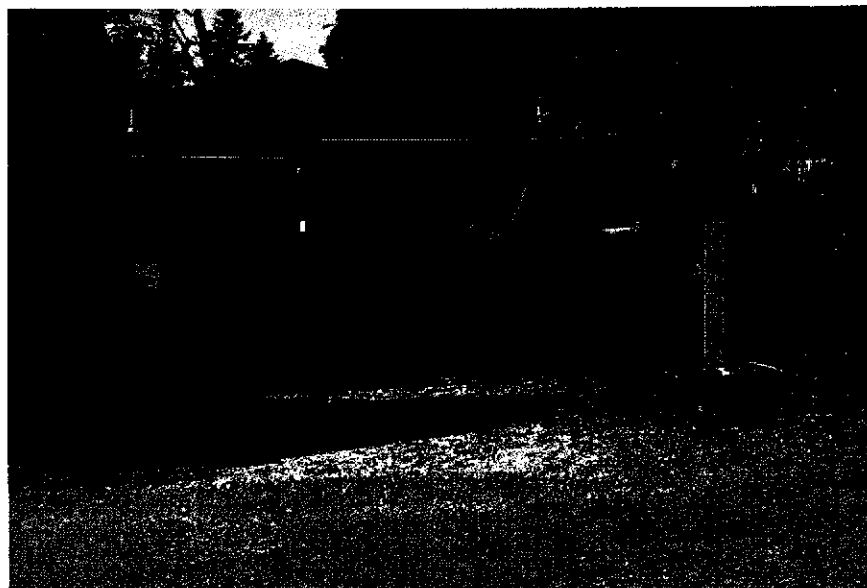
**Physical Description:** Storage unit with a blue-colored door, which is approximately four feet tall and three feet wide. Master key to the unit is held by 1<sup>st</sup> Avenue Self-Storage management.



## ATTACHMENT A42

Residence of Frances and Agustin JUAREZ Castillo: 20707 106th Pl. SE, Kent, Washington.

**Physical Description:** Single level single family brown residential dwelling with brown and white trim, a brown front door, a white garage door, a brown shingle roof, and the numbers "20707" affixed vertically to the right of the front door when facing the residence.



**ATTACHMENT A43**

Residence of Carlos HERNANDEZ: **521 S Henderson St., Seattle, Washington.**

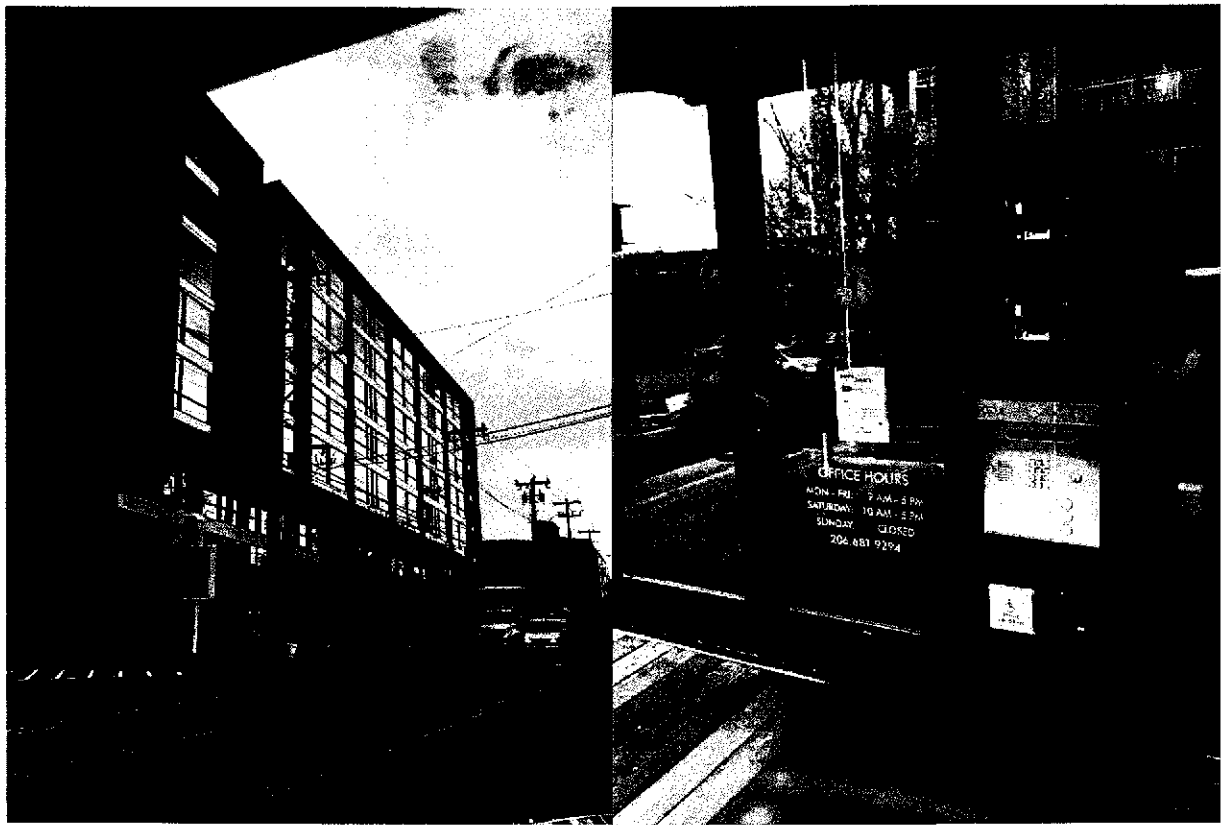
**Physical Description:** 1600 square foot light brown/tan two level single family dwelling with dark brown trim, 4 bedrooms and 1.5 bathrooms and a dark-colored front door. This residence has a surrounding fence.



## ATTACHMENT A44

Residence for Edgar CABRERA: 900 NE 65th St., Apartment 609, Seattle, Washington.

**Physical Description:** Newer studio apartment complex with secure access.



### ATTACHMENT A45

Residence for Constantino MARES Garcia: 1312 80th Ave. SE, Lake Stevens, Washington.

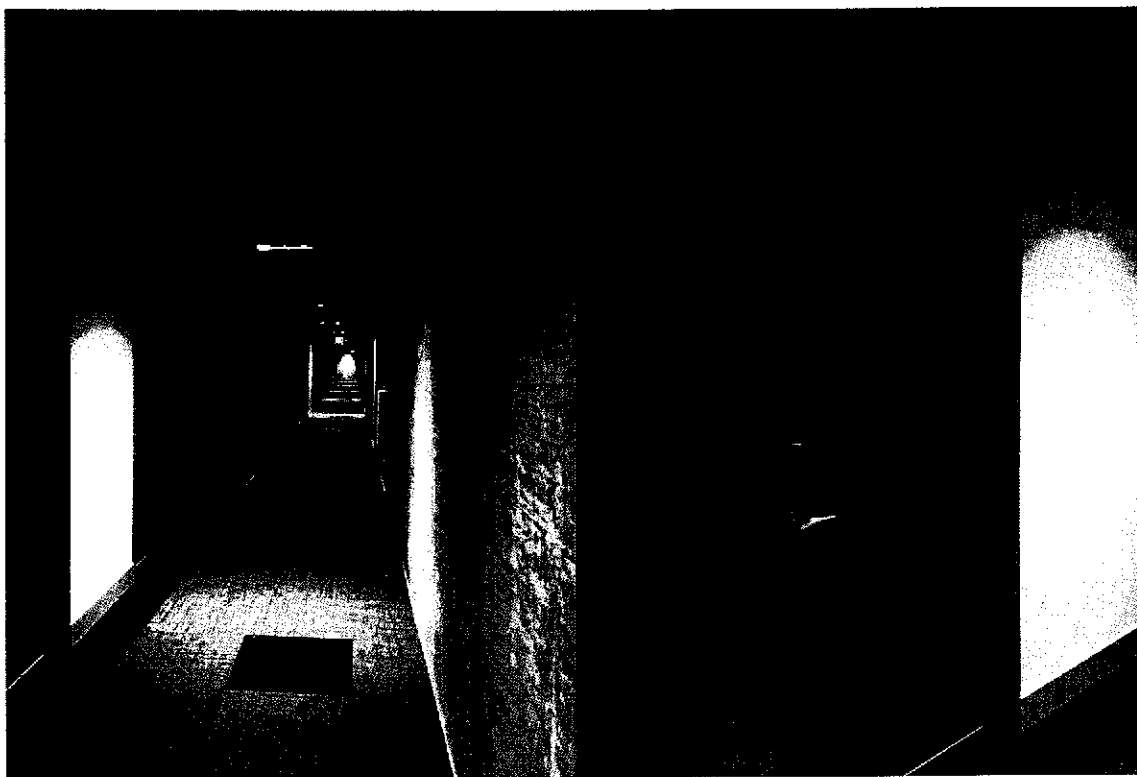
**Physical Description:** Two level brown-colored single family home with white trim and an attached garage. The numbers "1312" are affixed horizontally above the garage door. This residence is located near a dead end street.



### **ATTACHMENT A46**

Residence of Oscar Humberto CARRILLO Salcedo: **Airmark Apartments, 229 Andover Park East, Apartment 409, Tukwila, Washington.**

**Physical Description:** Apartment complex with long hallways. The number "409" is marked horizontally on a placard to the left of the door.

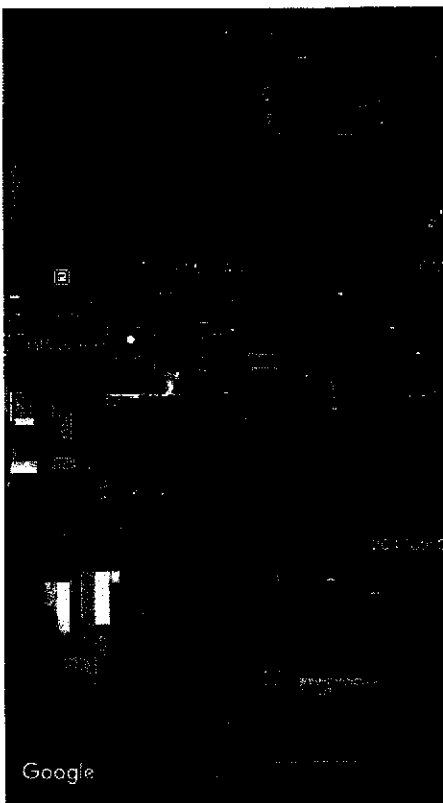
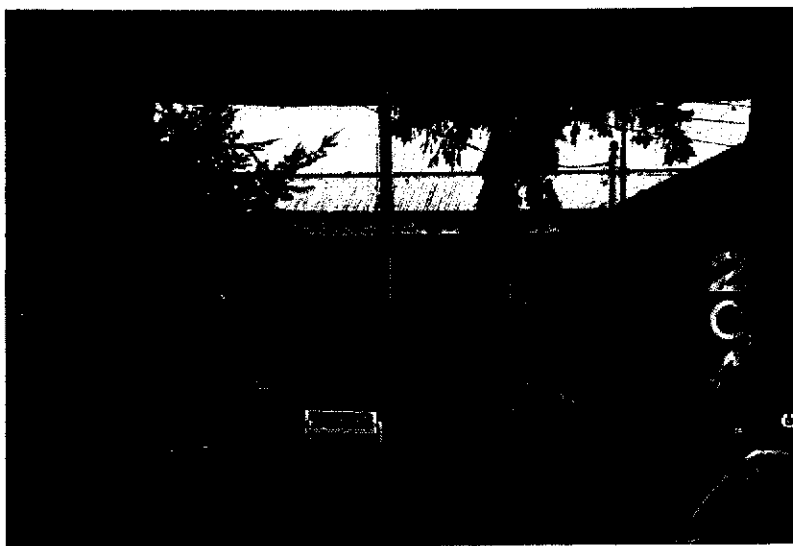




**ATTACHMENT A47**

Residence of Martin Dean GREGORY: 204 18th St. SE, Puyallup, Washington.

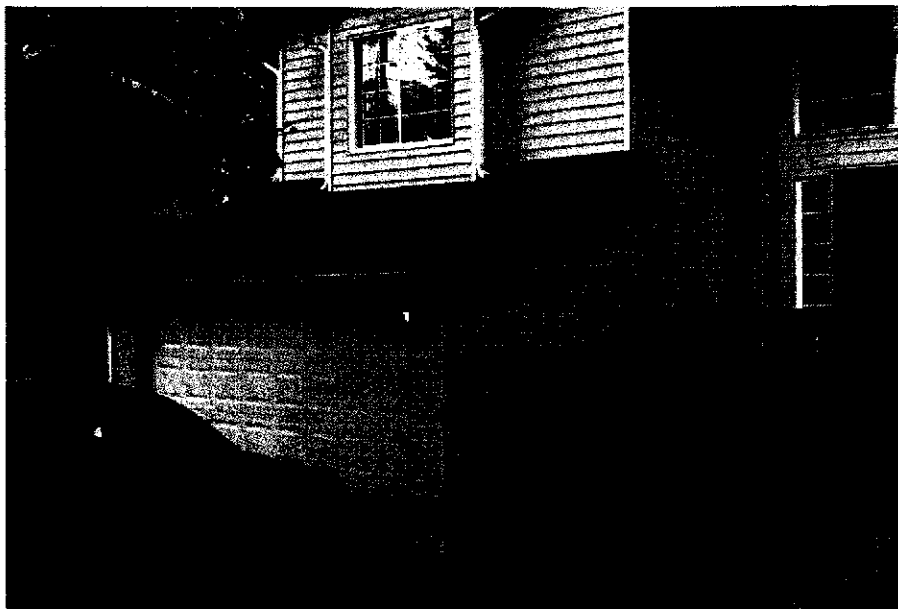
**Physical Description:** Blue-colored single family dwelling with a gate blocking the entrance to the driveway. To the right of the gate, the number "204" is placed vertically on a post.



### ATTACHMENT A48

Residence of Jose RANGEL Ortega: 11007 Paine Field Way Everett, Washington.

**Physical Description:** Two level single family gray single family dwelling with green and white trim, a white garage door, a white front door, and a black shingle roof, the numbers "11007" affixed vertically to the right of the garage door when facing the residence.



**ATTACHMENT A50**

A red 2006 Ford Ranger bearing Washington license C04697M and/or Vehicle Identification Number (VIN) 1FTYR44E66PA14670, registered to Gerardo Arias at 1020 SW 126th St., Apartment 214, Burien, Washington, used by Carlos Eduardo LOPEZ Hernandez.

**ATTACHMENT A51**

A white 2008 Honda Accord bearing Washington license BJN4395 and /or VIN 1HGCP26808A009967, registered to Shawn Shaputis at 8188 Graystone Way NW, Silverdale, Washington, but used by Jesus Rene SARMIENTO Valenzuela.

**ATTACHMENT A52**

A red 2002 Honda Civic bearing Washington license BKS2788 and/or VIN 1HGEM22912L053228, registered to Jaime HEREDIA Castro at 10115 Holly Drive, Apt B106, Everett, Washington.

**ATTACHMENT A53**

A beige 2001 Jeep Grand Cherokee bearing Washington license BKG1931 and/or VIN 1J4GW58N01C666831, registered to Juan Carlos AVILES at 11239 SE 260th St., Apt D-306, Kent, Washington.

**ATTACHMENT A54**

A 2016 Nissan Frontier bearing Washington license C30123H and/or VIN 1N6AD0EV0GN768584, registered to Cindy SOLTERO at 31600 126th Ave SE, Space 106, Auburn, Washington.



**ATTACHMENT A55**

A black 2007 Kia Rondo, bearing Washington license BLE9305 and/or VIN KNAFG525477034596, registered to Hector URIAS Moreno at 428 105th St. SW, Everett, Washington.

**ATTACHMENT A56**

A green 2005 BMW X5 bearing Washington license BJM0956 and/or VIN 5UXFA13595LY22689, registered to Alma Yesenia Moran Reyes at 125 SW Campus Dr., Apartment 4-205, Federal Way, Washington, but believed be used by Carlos Alejandro CASTRO Perez.

**ATTACHMENT A57**

A 2008 black Honda Civic bearing Washington License BFZ2558 and/or VIN 2HGFG21538H701703, registered to Adonia Melendez at 8024 150<sup>th</sup> St. SE, Snohomish, Washington, but believed be used by Michael John SCOTT.

**ATTACHMENT A58**

A 2000 tan Chevy Silverado bearing Washington license C67402H and/or VIN 1GCEK19T7YE110772, registered to Jason Reed at 1228 Crowe St. SE, Lacey, Washington, but used by Julian Gauge ORDONEZ.

**ATTACHMENT A59**

A silver 2013 Toyota Highlander bearing Washington license AQB8456 and/or VIN 5TDBK3EH8DS272785, registered to Michael and Esther SCOTT at 8024 150th St. SE, Snohomish, Washington.

**ATTACHMENT A60**

A grey Toyota Camry bearing Washington license BKD8497 and/or VIN 4T1BE46K49U323365, registered to Aureliano De Jesus-Bazante at 2010 Front St., Trailer 7, Lynden, Washington, but used by Edgar CABRERA.

**ATTACHMENT A61**

A red 1995 Mitsubishi Eclipse bearing Washington license AEV9270 and/or VIN 4A3AK44YXSE181939, registered to Jessica JOHNSON at 314 N 133rd St., Seattle Washington.



**ATTACHMENT A62**

A 2010 Harley Davidson motorcycle bearing Washington License 3E8988 and/or VIN 1HD1FR419AB631070, registered to Gerald RIGGINS at 5824 152nd St. E, Puyallup, Washington.

**ATTACHMENT A63**

A silver 2000 Toyota Camry bearing Washington license BKU5269 and/or VIN 4T1BG22K8YU641962, registered to Michael SURYAN at 2131 Freestad Rd., Arlington, Washington.

**ATTACHMENT A64**

A grey 2007 Toyota Scion, bearing Washington license BGH6676 and/or VIN JTKDE177170159625, registered as sold to Josafat RANGEL at 11007 Paine Field Way, Everett, Washington, used by Jose RANGEL Ortega.

**ATTACHMENT A65**

A white 1998 Honda bearing Washington license BKC6466 and/or VIN 1HGCG2258WA023530, registered to Constantino MARES Garcia at 16717 Alderwood Mall Pkwy, Apt K304, Lynnwood, Washington.

**ATTACHMENT A66**

A blue 2016 Toyota Tacoma bearing Washington license C08613M and/or VIN 3TMCZ5AN2GM006576, registered to Constantino MARES Garcia at 2510 164th St. SW, Apartment B105, Lynnwood, Washington.

**ATTACHMENT A67**

A red 2018 Chevrolet Silverado, bearing Washington license C66267L and/or VIN 3GCUKSEC7JG172100, registered to Wenceslao BARAJAS-Barajas at 628 East Fairhaven Ave., Burlington, Washington, but used by Orlando BARAJAS.

**ATTACHMENT A68**

A spray-painted red 2001 Lexus IS bearing Washington license 419ZVA and/or VIN JTHBD182410010023, registered as sold to Martin Dean GREGORY at 1006 W Main, Puyallup, Washington.



**ATTACHMENT A69**

A white 2012 Dodge Ram 1500 truck bearing Washington license C50312M and/or VIN 1C6RD7KP8CS278496, registered to Omar VALTIERRA at 16508 SE 147th St., Renton, Washington.

**ATTACHMENT A70**

A 2013 black Chrysler 300 sedan bearing Washington license AKG4277 and/or VIN 2C3CCAAG4DH533206, registered to Omar VALTIERRA at 16508 SE 147th St., Renton, Washington.

**ATTACHMENT A71**

A 2005 grey Volkswagen Jetta bearing Oregon license 902KTS and/or VIN 3VWPG71K75M643370, registered to Jorge VALENZUELA Armenta at 515 SW 13th Place, Apartment H3, Hermiston, Oregon.

**ATTACHMENT A72**

A 2001 white Nissan Altima bearing Washington license AVW7517 and/or VIN 1N4DL01D41C121162, registered to Cleotilde Velasco at 1400 North 30th St. 167, Mount Vernon, Washington, but used by Jose VELASCO.

**ATTACHMENT A73**

A 2000 black Mercedes 5004D bearing Washington license BLY6302 and/or VIN WDBNG75J9YA056681, registered to Brenden K Freitas at 3201 228th St. SW, Brier, Washington, but used by Andrew KRISTOVICH.

**ATTACHMENT A74**

A 2002 silver Mercedes 3204D bearing Washington license AYT2335 and/or VIN WDBRF64J92F203530, registered to Gabor Kallai at 3055 Burris Road Lot 148, Davie, Florida, but used by Brittany and Andrew KRISTOVICH.

**ATTACHMENT A75**

A 2012 white Hyundai Accent bearing California license 7CQD771 and/or VIN KMHCT4AE9CU170677, registered to Victoria Mendez at 2629 Lincoln Way D14, Lynnwood City, Washington, but used by Carlos Alejandro CASTRO Perez.



**ATTACHMENT A76**

A grey 2004 Hummer H2 bearing Washington license ADH9133 and/or VIN 5GRGN23U94H115275, registered to Salvador HERNANDEZ at 2014 S 26th Ave., Yakima, Washington, but used by Carlos HERNANDEZ.

**ATTACHMENT A77**

A black 1999 Toyota Corolla bearing Washington license AXZ8671 and/or VIN 1NXBR12E6XZ168642, registered to Juan Cervantes Falfan at 11315 26th Ave. S, Apartment 5-208, Burien, Washington, but used by Uriel ZELAYA.

**ATTACHMENT A78**

A 2010 red tractor trailer truck bearing California license XP09765 and/or VIN 1XKAD49X8AJ271744, registered to Southwester Carriers Corporation at 8684 Avenida De La Fuente, San Diego, California, but used by Ramon PUENTES.

**ATTACHMENT A79**

A blue 2004 Volvo S80 bearing Washington license plate BHK8013 and/or VIN YV1TS92DX41346028, registered to Jerry RODRIGUEZ Jaime at 859 116th Street S, Tacoma, Washington.

**ATTACHMENT A80**

A silver 2006 BMW bearing Washington license AYY7257 and/or VIN WBAVB13536PT26465, registered to Brian LIVELY at 8123 71st Pl. SE, Snohomish, Washington.

**ATTACHMENT A81**

A black Chevrolet Silverado bearing Washington license C21970N and/or VIN 3GCUKREC8JG497850, registered to Brian LIVELY at 8123 71st Pl. SE, Snohomish, Washington.

**ATTACHMENT A82**

A blue Ford focus bearing Washington License BER8834 and/or VIN 1FAFP34P32W344894, registered to Nicole Duke at 75 NE Brookdale Ln, Apartment E102, Bremerton, Washington, but used by Larry SWEITZER.



**ATTACHMENT 83**

A 1996 white Nissan Maxima bearing Washington license BGR7720 and/or VIN JN1CA21D2TT735849, registered to Joshua MENDIOLA at 10502 141st St. Court E, Puyallup, Washington.

**ATTACHMENT A84**

A 2016 Honda Accord bearing Arizona license CJN8101 and/or VIN 1HGCR2F72GA220572, registered to Paola Edith Morales Ortiz at 5727 East Seneca Street, Tucson, Arizona, but used by Oscar Humberto CARRILLO Salcedo.

**ATTACHMENT B**  
**Items to be seized**

From the locations and vehicles listed in Attachment A, and A1 through A84 of this warrant, the government is authorized to search for and seize the following items, which are evidence and/or fruits of the commission of the following crimes: distribution and possession with intent to distribute controlled substances in violation of Title 21, United States Code, Section 841(a)(1), and conspiracy to commit these offenses in violation of Title 21, United States Code, Section 846; use of a communications facility in furtherance of a felony drug offense in violation of Title 21, United States Code, Section 843(b); importation of controlled substances, in violation of Title 21, United States Code, Section 952; possession of firearms in furtherance of a drug trafficking crime, in violation of Title 18, United States Code, Section 924(c); and laundering of monetary instruments in violation of Title 18, United States Code, Sections 1956 and 1957, including the following:

- 1) Any suspected controlled substances, for example, methamphetamine, fentanyl, and heroin;
- 2) Firearms and firearms-related items, including magazines, ammunition, holsters, and body armor, or other dangerous weapons;
- 3) Cellular telephones and other communications devices including iPhones, smartphones, flip phones, and similar devices, which may be searched only for the following items:
  - Assigned telephone number and identifying serial number (e.g., ESN, MIN, IMSI, IMEI);
  - Stored list of recent received, sent, or missed calls;
  - Stored contact information;
  - Stored photographs of narcotics, currency, guns or other weapons, suspected criminal activity, and/or the user of the phone or co-conspirators; and

- Stored text messages that relate to the above-enumerated federal crimes;
- 4) Financial profits, proceeds and instrumentalities of trafficking in narcotics and money laundering, including US currency and other items of value;
  - 5) Paraphernalia for packaging, smuggling, processing, diluting, manufacturing, weighing, and distributing controlled substances, for example: hidden compartments, scales, blenders, funnels, sifters, grinders, glass panes, mirrors, razor blades, plastic bags, heat sealing devices, and diluting agents such as inositol, vitamin B12, etc.;
  - 6) Books, records, receipts, notes, ledgers, and other documents relating to the distribution of controlled substances, money laundering, communications between members of the conspiracy, and evidence of the use of apparently legitimate businesses to disguise profits;
  - 7) Photographs, video tapes, digital cameras, and similar items depicting friends and relatives of the property occupants, or suspected buyers or sellers of controlled substances, controlled substances, and assets derived from the distribution of controlled substances;
  - 8) Personal books and papers reflecting names, addresses, telephone numbers, and other contact or identification data relating to the distribution of controlled substances, and money laundering;
  - 9) Financial records relating to controlled substances income and expenditures of money and wealth, to wit: money orders, wire transfer records, cashier's checks and receipts, bank account records, passbooks, tax records, safe deposit box keys and records, checkbooks, and check registers, as well as precious metals and gems such as gold, silver, diamonds, etc.;
  - 10) Items of personal property that tend to identify the person(s) in residence, occupancy, control, or ownership of the premises and/or vehicle, including canceled mail, deeds, leases, rental agreements, photographs, personal telephone books, diaries, utility and telephone bills, statements, identification documents, and keys;

11) Identification documents, including passports, visas, alien registration cards, any travel documents, immigration documents, driver's licenses, identification cards, and social security cards;

12) Documents indicating travel in interstate and foreign commerce, to include airline tickets, notes and travel itineraries; airline schedules; gas receipts, bills; charge card receipts; hotel, motel, and car rental statements; correspondence with travel agencies and other travel related businesses; airline, rental car, and hotel frequent flier or user cards and statements; passports and visas; telephone bills; photographs of foreign locations; and papers relating to domestic and international travel;

13) Stored footage from surveillance systems at the locations to be searched which identifies the person(s) in residence, occupancy, control, or ownership of the premises; suspected buyers or sellers of controlled substances; persons in possession of firearms in furtherance of drug trafficking; and persons suspected of engaging in money laundering activities; and

14) Latent prints and identifying material from items at the residences and vehicles.